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# Appendix A

Response to Comments on the Draft  
Environmental Impact Statement



# APPENDIX A

## RESPONSE TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

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### A.1 INTRODUCTION

After publishing the draft EIS for the Coeur Rochester Mine Plan of Operations Amendment 10 on August 21, 2015, a 45-day comment period to receive comments on the Draft EIS was initiated. The comment period closed on October 5, 2015. The BLM received written comments by mail, fax, and email. In total, 142 comment letters were received in response to the Draft EIS Notice of Intent and publishing. Most of the letters supported the approval of POA 10 and the expansion of the Coeur Rochester Mine. Upon receipt, each comment letter was assigned an identification number and substantive comments were identified in **Section A.3** for comment response, retaining the link to the commenter. Several letters were duplicated and received from multiple commenters.

Although each comment letter was considered, the comment analysis process involved determining whether a comment was substantive or non-substantive in nature. In performing this analysis, the BLM relied on CEQ regulations to determine what constituted a substantive comment.

A substantive comment does one or more of the following:

- Questions, with a reasonable basis, the accuracy of the information and/or analysis in the EIS
- Questions, with a reasonable basis, the adequacy of the information and/or analysis in the EIS
- Presents reasonable alternatives other than those presented in the Draft EIS that meet the purpose and need of the proposed action and address significant issues

- Questions, with a reasonable basis, the merits of an alternative or alternatives
- Causes changes in or revisions to the proposed action
- Questions, with a reasonable basis, the adequacy of the planning process itself

Additionally, the BLM's NEPA handbook identifies the following types of substantive comments:

- Comments on the Adequacy of the Analysis: Comments that express a professional disagreement with the conclusions of the analysis or assert that the analysis is inadequate are substantive in nature but may or may not lead to changes in the Proposed RMP/Final EIS. Interpretations of analyses should be based on professional expertise. Where there is disagreement within a professional discipline, a careful review of the various interpretations is warranted. In some cases, public comments may necessitate a reevaluation of analytical conclusions. If, after reevaluation, the manager responsible for preparing the EIS (the BLM Authorized Officer) does not think that a change is warranted, the response should provide the rationale for that conclusion.
- Comments That Identify New Impacts, Alternatives, or Mitigation Measures: Public comments on a draft EIS that identify impacts, alternatives, or mitigation measures that were not addressed in the draft are substantive. This type of comment requires the Authorized Officer to determine whether it warrants further consideration. If it does, the Authorized Officer must determine whether the new impacts, new alternatives, or new mitigation measures should be analyzed in the Final EIS, a supplement to the Draft EIS, or a completely revised and recirculated Draft EIS.
- Disagreements with Significance Determinations: Comments that directly or indirectly question, with a reasonable basis, determinations regarding the significance or severity of impacts are substantive. A reevaluation of these determinations may be warranted and may lead to changes in the Final EIS. If, after reevaluation, the Authorized Officer does not think that a change is warranted, the response should provide the rationale for that conclusion.

Comments that failed to meet the above description were considered nonsubstantive. The BLM received 142 total unique submissions, however, 135 of those did not contain any substantive comments. Many comments received throughout the process expressed personal opinions or preferences, had little relevance to the adequacy or accuracy of the Draft EIS. These comments did not provide specific information to assist the planning team in making a change

to the Preferred Alternative, did not suggest other alternatives, and did not take issue with methods used in the Draft RMP/EIS, and are not addressed further in this document. Examples of some of these comments include the following:

- “The best of the alternatives is the Proposed Action (or No Action or Alternative I).”
- “Please accept this EIS immediately. It is the right thing to do.”

Opinions, feelings, and preferences for one element or one alternative over another, and comments of a personal or philosophical nature were all read, analyzed, and considered. Because such comments are not substantive in nature, the BLM did not respond to them. It is also important to note that, while all comments were reviewed and considered, comments were not counted as votes. The NEPA public comment period is neither considered an election nor does it result in a representative sampling of the population. Therefore, public comments are not appropriate to be used as a democratic decision-making tool or as a scientific sampling mechanism.

## **A.2 HOW THIS APPENDIX IS ORGANIZED**

This appendix is divided into three main sections. **Section A.1**, Introduction, provides an overview of the comment response process. **Section A.3**, Comment Responses, contains the substantive comments and responses for all letters that provided substantive comments during the public comment period. **Section A.4** includes all of the comments received during the comment response period.

## **A.3 SUBSTANTIVE COMMENTS**

### **Comment Letter 005**

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

#### **BLM Response**

In response to the comment, the BLM would require development of a treatment plan, which would include an interpretive panel to be on exhibit at the Marzen House Museum.

### **Comment Letter 006**

I disagree with Coeur Rochester's proposed action of moving the PAG material back into pit following mining.

Alternative I would decrease the potential for environmental degradation and should be considered for the preferred alternative.

**BLM Response**

The BLM has taken note of the commenter's preference for Alternative I, and will take all environmental aspects into consideration when choosing an alternative.

**Comment Letter 096**

Though we focus on Preble's shrew in this letter, we also recommend that BLM review EIS conservation measures (for example, appropriate buffer distances, survey protocols, and seasonal activity windows) for other special status species, including burrowing owls (*Athene cunicularia*).

**BLM Response**

The BLM has specific protocols that are used for Special Status Species, including burrowing owls. A voluntary environmental protection measure proposed by Coeur Rochester, Inc. (CRI) in coordination with the BLM is outlined in **Section 2.2.10** of the EIS for burrowing owls. Although the nearest known burrowing owl nest site is 0.5 mile from the project area, as is outlined in **Section 4.8** of the document, the BLM has specified that surveys will be completed before any surface disturbance takes place. The appropriate buffers and seasonal restrictions would be applied if any burrows were found. The text in **Section 2.2.10** has been revised to clarify that a burrowing owl survey would be conducted prior to ground disturbance in areas identified as potential burrowing owl habitat during any time of the year. Surveys would be conducted no more than 10 days and no fewer than 3 days before the disturbance. If an active burrow is located, then the BLM biologist would be notified immediately and a buffer of 500 meters, or line of sight, shall be placed around the burrowing owl's burrow until it vacates its burrow. If active burrows are located during the breeding season, then the active burrow shall not be disturbed until after the breeding season or the burrow is no longer active. **Section 4.8** was also revised to state that burrowing owl surveys would be conducted prior to ground disturbance in areas with potential burrowing owl habitat.

Additionally, Chapters 3 and 4 have been revised to discuss special status bat surveys at the Plainview Group Mines within the Limerick Basin. The 2015 Winnemucca District Office RMP guidance for protecting special status bat habitat, and potential impacts on special status bat species

**Comment Letter 096, continued**

From section five of the DEIS, we understand that American Spring will be covered, resulting in the permanent removal of this spring and the removal of "approximately 81 acres of modeled high potential Preble's shrew priority habitat ... representing approximately 11 percent of modeled high potential habitat in the project area." Though section 5-26 states that no mitigation is being proposed for this habitat loss, section 5-27 states that "mitigation measures described in Chapter 6 would further minimize potential impacts on special status species, including Preble's shrew." Below, we request clarification

as to 1) whether mitigation is being proposed and 2) if mitigation is proposed, how those measures will promote Preble's shrew conservation. Despite these mitigation measures, BLM acknowledges that incremental effects may still occur to special status species. BLM describes these mitigation measures or environmental protection measures if habitat is disturbed under this project. As we understand it, mitigation measures include the following actions: 1) an " ... an equal amount of potential shrew habitat [81 acres] would be surveyed for three seasons (spring, summer, and fall)" and 2) reclamation of "disturbed potential shrew habitat" with a "recommended seed mix that would support the shrew's habitat." We request further clarification per the following questions:

- I. Does BLM intend to mitigate for Preble's shrew? If so, what is the objective of that mitigation and how will it contribute to long-term conservation of Preble's shrew populations and associated habitats?

**BLM Response**

The proposed action is within an active mine site, but the vegetation in this area is suitable for Preble's Shrew habitat. As such, the BLM has directed that surveys will be conducted in modeled high potential habitat for the presence of the species. There are approximately 81 acres of habitat that would be disturbed by the project. To further knowledge of Preble's shrew, an environmental protection measure to survey for Preble's shrew and to reclaim disturbed habitat with a recommended seed mix that may support Preble's shrew has been incorporated into the proposed action, as described in **Chapter 2**. The purpose of the environmental protection measure is to determine if Preble's shrews are within the POA 10 boundary and to determine if the newly created NDOW/BLM survey protocol for Preble's shrew (described in **Chapter 3**) is effective in determining the presence of this species. If the surveys note the presence of Preble's shrew, then an equal number of acres of suitable habitat would be seeded with an appropriate seed mix to offset the loss of habitat acres.

The 336 acres of spring and meadow restoration included as part of greater sage-grouse restoration would also likely benefit small mammal species, including Preble's shrew, regardless of whether Preble's shrew is found during surveys within the POA 10 boundary. Areas identified for mitigation are in the Black Rock Desert-High Rock Canyon Emigrant Trails National Conservation Area (NCA) and Pine Forest Wilderness, which would provide for long-term conservation of Preble's shrew habitat as the federal land within the NCA and designated Wilderness Areas, subject to valid existing rights, were withdrawn from location, entry, and patent under the 1872 General Mining Law. Therefore, these areas provide further protection for special status species because multiple use activities, such as mining, are restricted.

Chapters 4, 5, and 6 have been revised to clarify mitigation objectives and effects.

**Comment Letter 096, continued**

2. The document states that a survey of 81 acres of potential shrew habitat will be surveyed for three seasons in one year following the removal of 81 acres in the mine amendment area. We have concerns that this survey approach of only 3 seasons in a single year will not provide adequate knowledge of species presence and status. Where will these surveys be located? While NDOW recognizes that gathering and analyzing information are crucial first steps for species protection and for effective conservation, it is important that survey programs be designed with clear objectives, methods, and deliverables in order to yield as accurate information as possible about a species. As presented in this document, it is unclear that the completion of surveys across 81 acres for 15 days (5 trapping days in 3 seasons per the protocol referenced above) in an undisclosed location is likely to provide information commensurate with the potential entire loss of a population. In addition, the protocol mentioned in the EIS pertains only to shrew trapping, but does not provide guidance for vegetation surveys and decisions about seed mixtures designed to provide for suitable Preble's shrew habitat at either a local or regional scale. While we support this type of endeavor and realize that a well-designed survey program is a first step, it seems unlikely that the activities outlined in the EIS will yield significant advancements in conservation of a special status species. We feel that the plans outlined in this document, in addition to permanent removal of habitat, will likely yield population loss in this area without providing benefits for regional populations.

**BLM Response**

The Preble's shrew environmental protection measure was created per the NDOW/BLM survey protocol. The NDOW/BLM survey protocol establishes the following seasonal requirements when surveying for Preble's shrew: "One 4-night trapping session should occur in each of three seasons: spring (April-May), summer (June-August) and fall (September-November). This is in order to capture seasonal variation in shrew abundance." The NDOW/BLM survey protocol does not establish that multiple years are required to determine seasonal variance. Per the protocol:

*"The purpose of the survey is to determine detection and therefore the need for protection measures for special status shrews. There are many factors that can account for a species not being verified in a surveyed area including poor sampling technique, animal rarity, unskilled observers, weather, seasonal use patterns, and intensity and duration of survey effort. Rarely can the determination of absence be made with certainty. Therefore, the conclusions of these survey results will be stated as detected or not detected rather than present or absent."*

The purpose of the surveys as identified in the environmental protection measure would be to determine if the species was detected or not detected. The surveys are also not established "to provide adequate knowledge of status" of the species as described in the comment.

A BLM wildlife biologist will determine the location of the surveys, in accordance with the NDOW/BLM survey protocol prior to the surveys. Generally, the surveys would be located in modeled high potential habitat. If the surveys detect Preble's shrew, then an equal number of acres of suitable habitat would be seeded with an appropriate seed mix to offset the loss of habitat. In order to help determine an appropriate seed mix for restoring potential Preble's shrew habitat, shrew surveys should record vegetation metrics, including species abundance, diversity, density, structure, and cover. Success criteria for Preble's shrew habitat restoration would be consistent with criteria in the Reclamation Plan.

Surveys to further knowledge of Preble's shrew is not a mitigation measure to protect the population, if present. However, reseeding disturbed potential Preble's shrew habitat may provide benefit to Preble's shrew by encouraging the species to return to the area (if they were present to begin with). Additionally, as stated above, the 336 acres of spring and meadow restoration included as part of greater sage-grouse restoration would also likely benefit small mammal species, including regional Preble's shrew populations.

Chapters 4 and 6 were updated to clarify effects and mitigation objectives for Preble's shrew, including describing the proposed survey protocol and revegetation approach for Preble's shrew habitat.

### **Comment Letter 096, continued**

3. BLM provides for reclamation of disturbed potential shrew habitat with a recommended seed mixture that would provide habitat for Preble's shrew. We would like further specifics on how this would provide habitat as little is known about habitat requirements for Preble's shrew. Where would this reclamation site be located? If the reclamation site includes the 81 acres, will American Canyon Spring be reclaimed and how will the seed mixture be determined? If so, what are the benchmarks of reclamation success? If the spring cannot be reclaimed (i.e. infiltration and flows returned to pre-EIS levels, appropriate water quality, etc.), how will the use of a seed mix promote shrew conservation, especially if shrews have been extirpated due to the permanent habitat loss described here? What are the benchmarks for successful Preble's shrew conservation and, will there be a monitoring plan to test if the mitigation measures (reclamation) have met these benchmarks? If post-project monitoring is not planned, how will BLM decide if the mitigation measures proposed here are effective and worth pursuing in subsequent projects?

### **BLM Response**

If surveys detect Preble's shrew, the seed mix for the 81 acres of Preble's shrew habitat restoration would be based on the vegetation types in the survey location where Preble's shrew was detected, along with vegetation types shown to support Preble's shrew and compatible with the specific re-seeding location. The best scientific information available coupled with site-specific data would be

used to develop the appropriate seed mix. American Canyon Spring (ACS) would be reclaimed, however that area would be a reclaimed heap leach pad, and not a spring. Therefore an alternate area for Preble's shrew habitat restoration would be chosen, that would have a lesser potential of future disturbance, such as in American Canyon. Additionally, as stated above, the 336 acres of spring and meadow restoration included as part of greater sage-grouse restoration would serve as suitable mitigation for the loss of ACS as well as likely benefit small mammal species, including regional Preble's shrew populations. The BLM has established guidelines for reclamation and for monitoring used for all mitigation projects. These benchmarks for vegetative success are described in **Section 6.1.1**, Recommended Mitigation Measures.

Chapters 4 and 6 were updated to clarify effects and mitigation objectives for Preble's shrew, including describing the proposed survey protocol and revegetation approach for Preble's shrew habitat.

#### **Comment Letter 097**

Pershing County desires to be a coordinating and cooperating agency.

#### **BLM Response**

A letter was sent on March 31, 2014 inviting Pershing County to be a cooperating agency. There was no initial response to this letter, therefore no official cooperating status was established while the Draft EIS was being developed. We acknowledge the desire to be a coordinating and cooperating agency, and will contact Pershing County regarding this request.

#### **Comment Letter 099**

Plans and specifications for the replacement of public drinking water wells PW-2A and PW-3A by proposed new wells PW-2B and PW-3B will need to be submitted to the Nevada Division of Environmental Protection (NDEP), Bureau of Safe Drinking Water (BSDW) for review and approval prior to construction.

#### **BLM Response**

Table I-1 of the EIS lists the existing permits for the site, and **Section 1.5** acknowledges that some of these permits may require updating for the proposed action. All required Federal, State, and local permits must be obtained or updated before any proposed construction would be authorized.

#### **Comment Letter 100**

Numerous post-closure monitoring and mitigation activities will need to be conducted by Coeur Rochester. Incorporated (CRI) to ensure protection of water quality and wildlife in the project vicinity. The Draft EIS includes a brief description of some of the post-closure obligations associated with the mine's continued operation expansion and the proposed revisions to the closure plan: however, it does not include a discussion of the need for post-closure financial assurances to pay for these activities, nor does it acknowledge the existing trust, which covers the currently approved closure and post-closure activities. In

addition no cost estimate for the long-term trust, nor any analysis of its adequacy or the uncertainties associated with the estimate are provided. Therefore, EPA finds that the Draft EIS does not adequately demonstrate that the costs of post-closure monitoring and mitigation for the expanded Coeur Rochester Mine Project will be covered for as long as needed to avoid significant environmental impacts.

#### **BLM Response**

**Figure 1-3**, a permitting flow diagram, has been included in Section 1.4. It outlines the BLM and NDEP permitting processes for closure and stabilization of HLPs, as required for plans of operations and water pollution control permits. Included in the flow diagram are the decision/permit issuance process, permit requirements, compliance monitoring, and closure monitoring. Also included are steps identifying the bond adjudication, bond release, and long-term trust processes.

Language has been added to **Section 1.4** (BLM and Non-BLM Policies, Plans and Programs) of the document to acknowledge the existence of the financial guarantee and long term trust (LTT) that is currently in place for Coeur Rochester's Plan of Operations. The 43 CFR 3809 regulations do not require information regarding reclamation cost estimates (RCEs) and Long Term Trusts (LTTs) for the plan of operations to be considered complete for NEPA review. Therefore, BLM does not and will not require such information from the operator, or generate it, for NEPA review unless the 43 CFR 3809 regulations are changed. The reason the BLM regulations do not include RCEs/LTTs in the NEPA process is that NEPA requires the agency to analyze potential environmental impacts from a proposed major federal action. The RCEs/LTT estimates are a financial backup if the operator fails to comply with the reclamation requirements. Those estimates are not part of the environmental impact analysis. No additional changes to the Final EIS text has been made to address the comment.

#### **Comment Letter 100, continued**

Important geochemical information is missing from the DEIS. According to data included in the project record but left out of the DEIS the residual heap leach solution that would drain down in the closure and post-closure period is anticipated to exceed Nevada Profile I water quality reference values for aluminum, antimony, arsenic, lead, copper, iron, mercury and silver (CRI, 2014). In addition, we note that although the spent ore samples tested did not generate acid during the test period, the consultant who performed this geochemical analysis recommended that this material be treated as potentially acid generating in the long term due to its acid base accounting characteristics (Knight Piesold Consulting 2013). It is, therefore, critical that the heap leach facilities achieve the zero-discharge goal intended by the closure design. EPA is unable to determine whether this goal is likely to be attained due to an incomplete description of the closure and post-closure management of the heap leach

facilities in the Draft. For example, the Draft EIS does not include any information regarding the time required for the heap leach facilities to reach a steady-state drainage rate, nor does the document note when, or even whether, the heap leach facilities are anticipated to reach a rate of drain-down that can be managed in a fully passive manner. Similarly, while the Draft EIS indicates that the heap leach e-cells would require excavation and total system replacement after 30 years (or sooner if post-closure monitoring identifies a need), it does not disclose that the e-cells would require excavation and replacement on a recurring 30 year interval -- an indefinitely recurring additional expense (personal correspondence with BLM staff, September 2015).

Absent sufficient funds for site maintenance, the potential exists that heap leach seepage exceeding numerous Nevada Profile I water quality reference values, and potentially of an acidic nature, would eventually be released to the environment due to an overflow of the plugged evaporation cells. E-cell D sits immediately above Lower American Canyon Spring, while c-cells G and in-heap cell H sit above South American Canyon Spring. These perennial springs feed small non-jurisdictional wetland communities and provide wildlife habitat. Any overflow from these c-cells would have a very short distance to travel before likely coming into contact with vegetation and wildlife communities. In addition, as discussed extensively in the Coeur Rochester Inc. Water Quantity and Quality Impacts Analysis” (Schlumberger Water Services, 2015), the mine site is underlain extensively by a fragmented network of shallow alluvial groundwater. This shallow alluvial groundwater would offer a ready pathway for any heap leach seepage that may escape containment to be transported into a surface water system.

The information that EPA believes is needed includes: (1) a detailed description of the post-closure obligations for the proposed project, (2) an estimate of the amount needed to cover the costs of these obligations, (3) a detailed description of the proposed long-term funding mechanism that would be established for the proposed project (or description of how the existing trust would be modified); and (4) the updated reclamation/closure bond amount needed for the project.

#### **BLM Response**

The information on post-closure activities is detailed in the Final Permanent Closure Plan (FPCP) and is summarized in Chapter 2 of the EIS for the reader. The NEPA Handbook H-1790-I states “The CEQ regulations require NEPA documents to be “concise, clear, and to the point” (40 CFR 1500.2(b), 1502.4). Similarly, the description of the affected environment is to be no longer than is necessary to understand the effects of the alternatives (40 CFR 1502.15). The FPCP was provided to the EPA and is available to the public if more information is needed.

Reclamation activities would be bonded as outlined in **Section 2.2.12**. Also see the previous response regarding cost estimates and LTTs in NEPA documents.

**Comment Letter 100, continued**

We recommend that BLM: determine the appropriate level of funding for the reclamation/closure bond and the proposed long-term funding mechanism for the proposed project; analyze the adequacy of the funding amount and mechanism, including associated uncertainties; and circulate this information in a Supplemental Draft EIS for public comment, in accordance with NEPA and CEQ's NEPA Implementation Regulations. We recommend the Supplemental Draft EIS evaluate the anticipated effectiveness and risks of the Coeur Rochester Mine closure and post-closure commitments, and demonstrate that sufficient funds would be available to implement the post-reclamation obligations for as long as they are needed. EPA respectfully requests the opportunity to review this information and provide BLM our feedback before you publish the Supplemental Draft EIS. EPA's detailed comments on the Draft EIS are enclosed (Enclosure 2).

BLM and EPA agree that adequate financial assurance at mines is important to safeguard the environment. EPA continues to believe that the adequacy of financial assurance is an important element to be addressed and disclosed in the NEPA process. Without this information, EPA believes that decision-makers will not have important information concerning the likelihood that sufficient resources will be available for closure and post-closure mitigation, and the public may not understand the potential environmental and fiscal consequences of a proposed project.

**BLM Response**

Requirements for preparing a supplemental EIS are found in the Council of Environmental Quality (CEQ) regulations at subpart 40 CFR 1502.9(C)(1), which states in part; "Agencies: Shall prepare supplements to either the draft or final environmental impact statement (EIS) if, i) The agency makes substantial changes in the proposed action that are relevant to environment concerns; ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts."

EPA comments to the Draft EIS focused on Heap Leach Closure and Post Closure Financial Assurance, Additional Long Term Monitoring and Maintenance Activities and Costs, Summary of Geochemical Characterization, and Climate Change.

The BLM has prepared the final EIS adding information that clarify and improves the EIS analysis based on EPA comments (40 CFR 1503.4), including;

- Regulatory requirements relating to reclamation bonding (**Section 2.2.12**);

- Additional information and clarification of post-closure heap leach monitoring of HLPs and proposed E-Cells (**Section 2.2.12**) ;
- Clarification of proposed e-cell maintenance activities (**Section 2.2.12**) and
- Provided additional geochemistry characterization data supporting the existing geochemical information provided in the DEIS (**Sections 3.7 and 3.8**).

Based on EPA and other public comments received on the DEIS and taking into consideration CEQ guidance with respect to supplemental EIS documents, the BLM has determined that a Supplemental Draft EIS is not necessary based on the following;

There were no substantial changes in the proposed action that are relevant to environmental concerns presented in the DEIS and there were no significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or impacts. As previously stated, The 43 CFR 3809 regulations do not require information regarding reclamation cost estimates (RCEs) and Long Term Trusts (LTTs) for the plan of operations to be considered complete for NEPA review. The reason the BLM regulations do not include RCEs/LTTs in the NEPA process is that NEPA requires the agency to analyze potential environmental impacts from a proposed major federal action. The RCEs/LTT estimates are a financial backup if the operator fails to comply with the reclamation requirements. Those estimates are not part of the environmental impact analysis, and are not required by the NEPA or the CEQ regulations.

Financial guarantees are updated and administered in accordance with 43 CFR 3809.500-599 in coordination with the Nevada Division of Environmental Protection (NDEP).

### **Comment Letter 100, continued**

#### **Heap Leach Closure and Post-Closure Financial Assurance**

At closure, residual drain-down from existing and proposed heap leach pads would be managed by a network of evaporation cells. Due to topographical constraints, limited space is available for the construction of these evaporation cells. Accordingly, a solution delivery and distribution system would connect many of these cells to one another in order to efficiently distribute the drain-down solution over the surface of the evaporation zone. According to the DEIS, the proposed action would extend the mine's life by an estimated five to seven years, after which a period of passive leaching would take place followed by approximately five years of active reclamation and site closure. The heap leach facilities, however, are anticipated to require post-closure management and maintenance. In addition to regular monitoring to ensure all fluid-management components are operating properly, the BLM estimates that solids would

accumulate in the evaporation cells, and, approximately 30 years after mine closure, the evaporation cells would need to be excavated, and their system components replaced. In conversations with BLM staff, we understand that this activity is conservatively estimated to be required every 30 years thereafter with no known or estimated end date.

Absent this post-closure site maintenance, it is likely that heap leach drain-down fluids would overflow the plugged c-cells, releasing mine influenced water to the environment. According to the data provided in the project record but excluded from the DEIS, the heap leach drain-down is anticipated to exceed Nevada Profile I reference values for aluminum, antimony, arsenic, lead, copper, iron, mercury, and silver. EPA notes that the c-cells are proposed for construction immediately adjacent to perennial springs fed by shallow groundwater. South American Canyon Spring and Lower American Canyon Spring feed a combined 0.2 acres of non-jurisdictional wetland habitat. Should the proposed c-cell system fail to contain heap leach residual drain-down solution, particularly at c-cells D, G, and in-heap cell II, then those solutions can be reasonably expected to daylight in one or more of these springs, impairing their water quality and posing a risk to any wildlife and livestock utilizing them. Thus, if heap leach facilities and evaporation ponds are not properly managed over the long-term, the project could result in significant and long-term degradation of surface water and/or groundwater quality, as well as wildlife exposure to acute or chronic toxicity.

In order to pay for the existing post-closure site maintenance and management obligations at the site, the BLM has required CRI to establish a long term trust fund. Under the proposed expansion, this trust would need to be expanded and revised, increasing post-closure expenses considerably: however, the DEIS discusses the mine's post-closure obligations in only a cursory fashion. The document does not disclose the mine's need for a long term trust fund to pay for post-closure maintenance, disclose that post-closure funds would be needed to perform c-cell maintenance for an unknown period of time following closure, nor describe probable impacts or contingencies if inadequate funds are available when needed. Without this information, EPA is unable to fully assess the potentially significant environmental impacts of the proposed project and whether the project might result in a long term financial liability to the federal government in the future. e.g., under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

**Recommendation:** Determine and disclose the level of funding that would be needed for closure of the Coeur Rochester Mine proposed expansion, and disclose the specific mechanism that would be established to ensure that sufficient funds would be available when needed for that purpose. Circulate this information in a Revised or Supplemental Draft EIS for public comment. Include in the Revised or Supplemental Draft EIS a more comprehensive discussion of the heap leach closure plan and post-closure management/maintenance

obligations. We recommend the document clearly describe the duration for which post closure site maintenance, particularly heap leach evaporation cell excavation and component replacement, will be required. We recommend the heap leach drain down curve (derived from Nevada Department of Environmental Protection's Reap Leach Drain-down Estimator) be included and its relevance described.

**BLM Response**

Please see the above responses to comments regarding **Figure I-3**, BLM-NDEP Permitting Flow Diagram, and the financial guarantee and LTT.

Additional HLDE drain-down information has been added to the Final EIS in Table 2-8, including drain-down duration/elapsed time over 30 years, and predicted drain-down rates in gallons per minute. .

Additional text has been added to **Sections 2.2.3, 2.2.9, and 2.2.12** as well as to **Section 4.5.4** to clarify that the HLPs are engineered to be zero-discharge facilities, and would be managed for zero-discharge to the environment, and would therefore not impact waters of the State.

**Comment Letter 100, continued**

**Additional Long-Term Monitoring Maintenance Activities and Costs**

The Draft EIS describes the proposed construction of 10 evaporation cells located at the toe of or on top of heap leach pads I through V. These cells would be managed by a relatively complicated solution delivery and distribution system in order to maximize total evaporation. The Draft EIS does not adequately describe the pumps incorporated into the design of some of the c-cells to move solution between the cells, nor the pumps used to move solution from the c-cell storage compartment up to the evaporation zone (p. 2-47). It is unclear how long these pumps would need to operate or how they would be maintained.

**Recommendation:** Describe, in the Revised or Supplemental Draft EIS, all maintenance and management activities that would be required in the post-closure period, including the maintenance requirements and eventual fate of the c-cell pumps.

In the Revised or Supplemental Draft EIS, specify all of the post-closure monitoring, O&M, and replacement activities, and describe their performance standards. Include the cost estimates for these activities, which are needed to estimate the overall long-term financial assurance obligation.

**BLM Response**

**Section 2.2.12** Reclamation has been revised to state that the proposed reclamation activities would be bonded in accordance with regulatory requirements of the Surface Management Regulations 43 CFR 3809, Nevada

Revised Statutes NRS 519A, and Nevada Administrative Code 519A, and that Coeur would revise the reclamation cost estimate and bond to reflect the proposed reclamation activities associated with the amended Plan of Operations 10 prior to commencing the proposed construction activities. Additionally, **Section 2.2.12** has been revised to include the reclamation and closure of the heap leach facilities in accordance with the FPCP Sections 4 and 5, and in accordance with Section 3 and 4 of the Plan of Operations. Long-term O&M and replacement activities will be included in the long-term trust. These long-term post closure maintenance activities will be detailed in a post-closure maintenance plan that will provide the framework for a trust funding mechanism for the long-term.

CRI would be responsible for the closure and environmental compliance of the project until such time as final closure is achieved. Information as to how CRI will fund the pumpback systems and closure activities are neither required by the BLM nor a part of the NEPA process. Funding of the proposed action is not analyzed as part of NEPA, as the purpose of NEPA is to analyze the environmental impacts of the Proposed Action. Regulations under 43 CFR 3809 ensure compliance during both operations and reclamation.

#### **Comment Letter 100, continued**

Mine-influenced seepage emanating from the Stage I heap leach facility, its process ponds and pipelines has impacted shallow alluvial groundwater in the project area since as early as 2001. The Draft EIS indicates that process solution and calcium hypochlorite from accidental releases entered the shallow sediments adjacent to and/or underlying the Stage I heap (p. 1-17). In 2013, the Nevada Department of Environmental Protection mandated the installation and operation of a pump-back well system on the project site to prevent the spread of the contaminated plume at the site. This pump-back well now operates at a rate of approximate five gallons per minute. Page 2-58 of the Draft EIS indicates that this pump-back well would continue groundwater remediation pumping and recovery during the mine closure period, however the Draft EIS does not indicate the fate of this activity in the post-closure period. Although the c-cell system is designed for management of the pump-back volume in addition to the heap leach drain-down solution, it is unclear whether this well would be required to operate in perpetuity and, if so, what the expense of this activity would be and how it would be funded.

**Recommendation:** Describe, in the Revised or Supplemental Draft EIS, the closure and post closure plans for the groundwater remediation pumpback well. Include the anticipated operational timeline for this system and how its continued operation would be funded for as long as it is required.

#### **BLM Response**

Text has been added at **Section 2.3.1** that details groundwater remediation. The groundwater remediation system will be operated until State of Nevada

water quality criteria is achieved. Several enhancements were made to the groundwater remediation system in 2013, although these were not required to be installed until mine closure. As a result, it is not anticipated that the system will require operation into closure; however, the FPCP (and e-cell capacity) is conservatively designed to accommodate the long-term operation of the groundwater remediation system.

### **Comment Letter 100, continued**

#### **Summary of Geochemical Characterization**

Many BLM Mining EISs include a detailed discussion of the geochemical testing procedures employed and the results thereof; however, the Coeur Rochester Draft EIS contains only a very cursory summary of the geochemical characterization of the project's waste rock and ore materials, and notes that much of the geochemical analysis was performed before existing current testing methods and regulatory guidance were developed. While included in separate reference materials as part of the Plan of Operations, a description of the chemistry of the residual heap leach drain-down solution was not included in the Draft EIS. Absent this information, it is impossible to assess the importance and adequacy of many other project components. EPA found that, in order to access geochemical information fundamental to understanding the project's potential to degrade surface and groundwater quality, it was necessary to access referenced materials and the appendices of those referenced materials.

EPA supports the practice of "incorporation by reference" in the NEPA process in order to control the length and technical detail contained in an EIS; however, sufficient summary information should be included in the DEIS to enable the reader to understand the design and impacts of the proposed project and its alternatives. Supporting documentation can then be included in an appendix or incorporated by reference, as appropriate (See CEQ's "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations" [Question 25b] for guidance on determining whether inclusion as an appendix or incorporation by reference is warranted). In this case, however, BLM did not include sufficient summary of, or citation or access to, key relevant information needed for informed decision making.

**Recommendation:** Include in the Revised or Supplemental Draft EIS a thorough discussion of the geochemical characteristics of project waste rock and ore, including a discussion of anticipated heap leach drain down solution. We recommend this discussion include not only the acid generating/acid neutralizing potential of these materials, but also their metals leaching potential and the concentrations of the relevant constituents anticipated in waste rock seepage and heap leach drain down.

Consider making referenced materials, including the Plan of Operations and its appendices, available in an electronic format or via download from the BLM's website. For future projects, we strongly recommend that this be done at the

DEIS stage of the NEPA process, and that any documents incorporated by reference be sufficiently summarized in the DEIS.

**BLM Response**

Additional text added to **Section 2.2.3** Heap Leach pads to include additional information on Heap Leach lining. Additionally, **Section 3.8.2** was revised to include information on the geochemical analysis completed, with a summary of analysis results.

**Comment Letter 100, continued**

**Climate Change**

On December 18, 2014, the Council on Environmental Quality released revised draft guidance for public comment that describes how Federal departments and agencies should consider the effects of greenhouse gas emissions and climate change in their National Environmental Policy Act reviews. This guidance explains that agencies should consider both the potential effects of a proposed action on climate change, as indicated by its estimated greenhouse gas emissions, and the implications of climate change for the environmental effects of a proposed action.

The DEIS briefly discusses climate change and includes a calculation of the project's approximate CO<sub>2</sub> emissions and a discussion of the social cost of carbon in relationship to this project. Additionally, the DEIS compares the approximate CO<sub>2</sub> emissions associated with the project with global emissions. We believe the comparison of project emissions to global emissions does not provide meaningful information for a project-specific analysis. The DEIS does not identify any mitigation measures that could reduce or minimize the project's greenhouse gas emissions, nor does it consider climate change's potential impact upon the project. The latter is particularly relevant, given the limited evaporation cell capacity, the high metals concentrations of heap leach drain down solution, and the potential that climate change may affect precipitation patterns in the project area.

Recommendations: Include in the Revised or Supplemental DEIS a robust discussion of the potential impacts of climate change on the project and its environmental outcomes.

Instead of comparing project level emissions to global, U.S., or statewide emissions, provide a frame of reference, such as an applicable Federal, state, tribal or local goal for GHG emission reductions, and discuss whether the emissions levels are consistent with such goals.

Identify and disclose all relevant, reasonable mitigation measures that could reduce greenhouse gas emissions, even if they are outside the jurisdiction of the BLM'. We offer the following potential measures for the BLM's consideration:

- Incorporation of energy efficiency measures and appropriate alternative energy components into the project, such as on-site solar and/or geothermal power generation:
- Use of conveyors rather than haul trucks wherever feasible, e.g., for transporting ore to processing areas and the heap leach facility; and
- Establishment of ride sharing or shuttle opportunities for mine employees commuting to the site from both nearby and distant communities.

**BLM Response**

BLM determined that the climate change discussion within the air quality section is sufficient. GHGs including methane were addressed in the CO<sub>2</sub> equivalence analysis.

**A.4 ALL COMMENTS RECEIVED DURING THE COMMENT PERIOD**

**Comment Letter 001**

From: Nathan Earl Robison <supporter@supportcoeurrochester.com>

Date: Mon, Aug 31, 2015 at 6:56 PM

Subject: Coeur Rochester's expansion

To: wfoweb@blm.gov

I have been a consultant to Coeur Rochester for 16 years, and they are without peer as a responsible, steady, good-stewardship mining company. They are the kind of business you want on public land, contributing to the local and national economies.

I urge you to approve and move forward with this expansion plan and approve POA 10 as quickly as possible.

Sincerely,  
Nathan Earl Robison  
nathan@robisoneng.com  
Reno, NV 89511

**Comment Letter 002**

From: Solani dreiesbach <supporter@supportcoeurrochester.com>

Date: Tue, Sep 1, 2015 at 7:57 AM

Subject: Comments on Rochester Mine near Lovelock

To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

Less than 2% of the material encountered during mining of the Rochester Pit may be potentially acid generating. I support Coeur moving the in pit PAG material storage to the top of waste rock pile and think that the method of encapsulation proposed is conservative. This approach will help protect surface

water and groundwater in the region. Therefore, I propose that Alternative 1 is selected as the preferred alternative in the EIS.

This expansion plan offers the environmental protection, good jobs, economic stimulus and production of precious metal that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Solani dreiesbach  
Ballsranch@gmail.com  
furnlee, NV 89111

**Comment Letter 003**

From: Timothy M.Rogar <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 2, 2015 at 7:00 AM  
Subject: Coeur POA 10 Project (Rehberg)  
To: wfoweb@blm.gov

Coeur Rochester's operation results in positive economic and environment conditions that strengthen our surrounding areas and communities. Please approve Amendment 10.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

Please approve the plan and make the expansion of mining at Rochester a reality.

Sincerely,  
Timothy M. Rogar  
trogar@charter.net  
Fallon, NV 89406

**Comment Letter 004**

From: Gina Hawkins <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 2, 2015 at 6:28 AM  
Subject: Expand operations at the Rochester Mine  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan and extend the life of the mine by five to seven years.

Coeur has Hazardous Materials and Waste Management Plans that are in effect and complete and, as per the Envirofacts Database search function on the EPA website, there is a pattern of compliance. So it seems like Coeur manages their wastes properly and I am in support of continued mining operations at Coeur Rochester.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations.

Thank you.  
Sincerely,  
Gina Hawkins  
ghawkins@coeur.com  
Lovelock, NV 89419

**Comment Letter 005**

From: Shelby <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 1, 2015 at 8:20 PM  
Subject: Rochester Mine POA No. 10  
To: wfoweb@blm.gov

The best way to move forward at the Coeur Rochester Mine is for the BLM to approve Plan of Operations Amendment 10.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations. Thank you.

Sincerely,  
Shelby  
swanner@coeur.com  
Lovelock , NV 89419

**Comment Letter 006**

From: dustin burrows <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 1, 2015 at 8:16 PM  
Subject: Coeur Rochester's expansion  
To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

I disagree with Coeur Rochester's proposed action of moving the PAG material back into pit following mining.

Alternative 1 would decrease the potential for environmental degradation and should be considered for the preferred alternative.

Let's get moving as quickly as possible to make this expansion happen. It's the best thing for the environment, great for Pershing County and much needed for our economy and tax base.

Sincerely,  
dustin burrows  
dburrows485@gmail.com  
lovelock, NV 89419

**Comment Letter 007**

From: Michael Mancebo <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 1, 2015 at 7:04 PM  
Subject: Approve Plan of Operations Amendment 10  
To: wfoweb@blm.gov

Thank you for allowing me to comment on the proposed expansion of the Coeur Rochester Mine.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

I urge you to approve and move forward with this expansion plan and approve POA 10 as quickly as possible.

Sincerely,  
Michael Mancebo  
Mmancebo@sbcglobal.net  
Lovelock, NV 89419

**Comment Letter 008**

From: Wendy A Schlyer <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 2, 2015 at 10:15 AM  
Subject: Comments on Rochester Mine near Lovelock  
To: wfoweb@blm.gov

Allow me to voice my strong support for Coeur Rochester's expansion plan.

Coeur seems committed to environmental protection and stewardship and reports on its website that overall greenhouse gas emissions have reduced 24% since 2012. The EIS demonstrates that the proposed actions will have a negligible effect on climate change because Chapter 5 states that cumulative modeling results indicate that the ambient concentrations for all modeled criteria pollutants will be below the applicable NAAQS.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations.

This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
Wendy A Schlyer  
wendysattic@hotmail.com  
Winnemucca, NV 89446

**Comment Letter 009**

From: Dennis Vincent deBraga <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 2, 2015 at 5:15 PM  
Subject: Comments on Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

Thank you for addressing and analyzing potential impacts on air quality from mine emissions. Although the proposed action and alternatives would increase the atmospheric emissions of pollutants, Chapter 4 in the EIS identifies that emissions will still remain below regulated thresholds.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations. Thank you.

Sincerely,  
Dennis Vincent deBraga  
deBraga9@aol.com  
Lovelock, NV 89419

**Comment Letter 010**

From: Dennis Vincent deBraga <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 2, 2015 at 5:17 PM  
Subject: Move forward with Coeur Rochester's expansion  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan and extend the life of the mine by five to seven years.

The EIS appears to have thoroughly addressed potential impacts to cultural resources. One historic site would be visually and directly impacted and one multi-component site would be directly impacted. But, the mitigation that BLM has designed will make these impacts insignificant and I am in support of the proposed expansion.

Please move forward in approving this expansion plan in a timely manner. It's the right thing to do.

Sincerely,  
Dennis Vincent deBraga  
deBraga9@aol.com  
Lovelock, NV 89419

**Comment Letter 011**

From: Wesley Frank Chico <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 2, 2015 at 8:51 PM  
Subject: Approve Coeur Rochester's proposal  
To: wfoweb@blm.gov

I appreciate the BLM offering this opportunity to comment on the Coeur Rochester plan to expand operations at the Rochester mine.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

Please approve the plan and make the expansion of mining at Rochester a reality.

Sincerely,  
Wesley Frank Chico  
thecheeks69@gmail.com  
Lovelock, NV 89419

**Comment Letter 012**

From: Charles O.Sayles Jr. <supporter@supportcoeurrochester.com>  
Date: Thu, Sep 3, 2015 at 5:38 AM  
Subject: Please approve Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Allow me to voice my strong support for Coeur Rochester's expansion plan.

Coeur has Hazardous Materials and Waste Management Plans that are in effect and complete and, as per the Envirofacts Database search function on the EPA website, there is a pattern of compliance. So it seems like Coeur manages their wastes properly and I am in support of continued mining operations at Coeur Rochester.

Thank you for the opportunity to make my comments heard. Please make the Coeur Rochester expansion happen soon.

I work for Coeur Rochester and I see every day through the actions of all employees how focused we are on safety, the environment and then production.

Sincerely,  
Charles O. Sayles Jr.  
chucksayles@sbcglobal.net  
Lovelock, NV 89419

**Comment Letter 013**

From: Jerry E Minor <supporter@supportcoeurrochester.com>

Date: Thu, Sep 3, 2015 at 7:58 PM  
Subject: I support Coeur Rochester  
To: wfoweb@blm.gov

I appreciate the BLM offering this opportunity to comment on the Coeur Rochester plan to expand operations at the Rochester mine.

As described in Chapter 4 of the EIS in the Air Quality Sections, emissions from the proposed project would increase US CO<sub>2</sub>e emissions and global emissions, however, at the national and global scales this would result in a negligible impact. CRI has instituted best available technologies in their facilities design to control and reduce emissions and impacts to air quality from constituents like mercury, carbon, and other analytes.

Let's get moving as quickly as possible to make this expansion happen. It's the best thing for the environment, great for Pershing County and much needed for our economy and tax base.

Sincerely,  
Jerry E Minor  
jillznjerz@att.net  
Fallon, NV 89406

**Comment Letter 014**

From: Craig Mcauliffe <supporter@supportcoeurrochester.com>  
Date: Thu, Sep 3, 2015 at 8:18 PM  
Subject: Rochester Mine POA No. 10  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan and extend the life of the mine by five to seven years.

I appreciate that the POA 10 expansion was designed to avoid visual impacts to the Rochester Cultural District in Rochester Canyon. Even if visual impacts were to occur, it will complement the theme of the historic mining district.

I urge you to approve and move forward with this expansion plan and approve POA 10 as quickly as possible.

Sincerely,  
Craig Mcauliffe  
Mcauliffe888@yahoo.com  
lovelock, NV 89419

**Comment Letter 015**

From: Mary Mcauliffe <supporter@supportcoeurrochester.com>  
Date: Thu, Sep 3, 2015 at 8:22 PM  
Subject: Please approve Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Please add my name to the list of those who support Coeur Rochester's expansion plans.

The EIS appears to have thoroughly addressed potential impacts to cultural resources. One historic site would be visually and directly impacted and one multi-component site would be directly impacted. But, the mitigation that BLM has designed will make these impacts insignificant and I am in support of the proposed expansion.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations.

This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
Mary Mcauliffe  
Craig.mcauliffe@yahoo.com  
lovelock, NV 89419

**Comment Letter 016**

From: Mary Mcauliffe <supporter@supportcoeurrochester.com>  
Date: Thu, Sep 3, 2015 at 8:22 PM  
Subject: Comments on Rochester Mine near Lovelock  
To: wfoweb@blm.gov

I am in strong support of Coeur Mining's proposal to expand operations at the Rochester Mine and ask that you approve this plan as soon as possible.

Less than 2% of the material encountered during mining of the Rochester Pit may be potentially acid generating. I support Coeur moving the in pit PAG material storage to the top of waste rock pile and think that the method of encapsulation proposed is conservative. This approach will help protect surface water and groundwater in the region. Therefore, I propose that Alternative I is selected as the preferred alternative in the EIS.

This expansion plan offers the environmental protection, good jobs, economic stimulus and production of precious metal that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Mary Mcauliffe  
Craig.mcauliffe@yahoo.com  
lovelock, NV 89419

**Comment Letter 017**

From: Allie Mcauliffe <supporter@supportcoeurrochester.com>  
Date: Fri, Sep 4, 2015 at 6:33 PM  
Subject: Strong support for Coeur Rochester  
To: wfoweb@blm.gov

Count me among the supporters of Coeur Rochester's expansion plan.

From reviewing the EIS, I understand there will be no effects to air quality beyond the proposed mine plan boundary, which would 1) not impact surrounding wildlife habitat and 2) limit dust to the existing disturbed areas. Further, with the existing dust control measures in place, the emissions would be localized and won't affect the scenic value of the area.

The positive impact that the expansion of this mine will have on Pershing County and all of Nevada is very significant and I urge you to approve and move forward with this plan quickly. Thank you.

Sincerely,  
Allie Mcauliffe  
amcauliffe23@gmail.com  
Lovelock, NV 89419

**Comment Letter 018**

From: Ryan mcauliffe <supporter@supportcoeurrochester.com>  
Date: Fri, Sep 4, 2015 at 6:35 PM  
Subject: Coeur Rochester's expansion  
To: wfoweb@blm.gov

I appreciate the BLM offering this opportunity to comment on the Coeur Rochester plan to expand operations at the Rochester mine.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

I urge you to approve and move forward with Coeur Rochester's expansion plan and approve it as quickly as possible.

Sincerely,  
Ryan mcauliffe  
[Dream0crusher@yahoo.com](mailto:Dream0crusher@yahoo.com)  
Winnemucca , NV 89445

**Comment Letter 019**

From: Mike gentry <supporter@supportcoeurrochester.com>  
Date: Fri, Sep 4, 2015 at 6:37 PM  
Subject: Comments on Rochester Mine near Lovelock  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan and extend the life of the mine by five to seven years.

As described in Chapter 4 of the EIS in the Air Quality Sections, emissions from the proposed project would increase US CO<sub>2</sub>e emissions and global emissions, however, at the national and global scales this would result in a negligible impact. CRI has instituted best available technologies in their facilities design to control and reduce emissions and impacts to air quality from constituents like mercury, carbon, and other analytes.

I urge you to approve and move forward with Coeur Rochester's expansion plan and approve it as quickly as possible.

Sincerely,  
Mike gentry  
Crazycountrygirl1@yahoo.com  
Cedarville , CA 96104

**Comment Letter 020**

From: Amanda akers <supporter@supportcoeurrochester.com>  
Date: Fri, Sep 4, 2015 at 6:39 PM  
Subject: Rochester Mine POA No. 10  
To: wfoweb@blm.gov

I am in strong support of Coeur Mining's proposal to expand operations at the Rochester Mine and ask that you approve this plan as soon as possible

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

This expansion plan offers the environmental protection, good jobs, economic stimulus and production of precious metal that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Amanda akers  
Mcauliffe.3@sbcglobal.net  
Winnemucca , NV 89445

**Comment Letter 021**

From: Joyce poor <supporter@supportcoeurrochester.com>  
Date: Fri, Sep 4, 2015 at 6:40 PM  
Subject: Comments on Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Allow me to voice my strong support for Coeur Rochester's expansion plan.

I support Alternative 1 because it makes sense to only handle the material once which will help limit surface area and exposure to oxygen creating an environment where ARD conditions could occur.

Please move forward in approving this expansion plan in a timely manner. It's the right thing to do.

Sincerely,  
Joyce poor  
Ednaj2083@frontier.ne  
Susanville, CA 96130

**Comment Letter 022**

From: Lisa Booth <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 8, 2015 at 10:42 AM  
Subject: support Coeur Rochester's expansion  
To: wfoweb@blm.gov

I fully support Coeur Rochester's expansion project. Coeur is very proactive in environmental protection. They also have an extremely good safety record. Coeur Rochester is a very important asset to Pershing County and Lovelock through its employment of local residents and the numerous local organizations that Coeur supports.

Please do not delay in approving Coeur's required permitting.  
Thank you.

Sincerely,  
Lisa Booth  
lbooth@cityoflovelock.com  
Lovelock, NV 89419

**Comment Letter 023**

From: Adam WATson <supporter@supportcoeurrochester.com>  
Date: Sun, Sep 6, 2015 at 6:25 AM  
Subject: Coeur Rochester's expansion  
To: wfoweb@blm.gov

I'm writing to submit my thoughts about Coeur Rochester's plan to expand mining operations in Pershing County.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

Please do the right thing and make the expansion of mining at Coeur Rochester a reality. The region is counting on it.

Sincerely,  
Adam WATson  
watson1181@gmail.com  
lovelock, NV 89419

**Comment Letter 024**

From: arthur willms <supporter@supportcoeurrochester.com>

Date: Sun, Sep 6, 2015 at 6:24 AM

Subject: Coeur Rochester's plan

To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan and extend the life of the mine by five to seven years.

As described in Chapter 4 of the EIS in the Air Quality Sections, emissions from the proposed project would increase US CO<sub>2</sub>e emissions and global emissions, however, at the national and global scales this would result in a negligible impact. CRI has instituted best available technologies in their facilities design to control and reduce emissions and impacts to air quality from constituents like mercury, carbon, and other analytes.

Thank you for the opportunity to make my comments heard. Please make the Coeur Rochester expansion happen soon.

Sincerely,  
arthur willms  
awillms@coeur.com  
lovelock, NV 89419

**Comment Letter 025**

From: Ashley gentry <supporter@supportcoeurrochester.com>

Date: Fri, Sep 4, 2015 at 6:43 PM

Subject: Expand operations at the Rochester Mine

To: wfoweb@blm.gov

I am in strong support of Coeur Mining's proposal to expand operations at the Rochester Mine and ask that you approve this plan as soon as possible.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

Please do the right thing and make the expansion of mining at Coeur Rochester a reality. The region is counting on it.

Sincerely,  
Ashley gentry  
Amcau@gmail.com  
Cedarville, CA 96104

**Comment Letter 026**

From: Noah gentry <supporter@supportcoeurrochester.com>

Date: Fri, Sep 4, 2015 at 6:43 PM

Subject: Please approve Coeur Rochester's expansion plan

To: wfoweb@blm.gov

Thank you for the opportunity to submit a comment regarding the Rochester Mine POA No. 10.

Coeur has Hazardous Materials and Waste Management Plans that are in effect and complete and, as per the Envirofacts Database search function on the EPA website, there is a pattern of compliance. So it seems like Coeur manages their wastes properly and I am in support of continued mining operations at Coeur Rochester.

I urge you to approve and move forward with Coeur Rochester's expansion plan and approve it as quickly as possible.

Sincerely,  
Noah gentry  
amcauliffe23@gmail.com  
Lovelock, NV 89419

**Comment Letter 027**

From: Edna poor <supporter@supportcoeurrochester.com>

Date: Fri, Sep 4, 2015 at 6:41 PM

Subject: Proposed expansion of the Coeur Rochester Mine

To: wfoweb@blm.gov

Coeur Rochester's operation results in positive economic and environment conditions that strengthen our surrounding areas and communities. Please approve Amendment 10.

Although it appears that acid generation is unlikely given the geology and low acidity of the rock types found onsite, Coeur Rochester has gone above and beyond to ensure that sufficient measures are in place to monitor for unlikely ARD formation. As stated in Section 2.2.10 of the EIS, Coeur has also implemented new contingency measures should development of ARD be identified, which further demonstrates Coeur's commitment to environmental protections.

Put simply: I strongly support Coeur Rochester's proposal to expand mining and urge you to make a favorable decision on POA 10 as soon as possible.

Sincerely,  
Edna poor  
Ednaj2083@yahoo.com  
Susanville, CA 96130

**Comment Letter 028**

From: Dale L.Honea <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 8, 2015 at 1:54 PM  
Subject: I support Coeur Rochester  
To: wfoweb@blm.gov

I'm writing to submit my thoughts about Coeur Rochester's plan to expand mining operations in Pershing County.

I support Alternative I because it makes sense to only handle the material once which will help limit surface area and exposure to oxygen creating an environment where ARD conditions could occur.

The environmental impact will be insignificant and the economic impact will be substantial. Please approve Coeur Rochester's expansion plan as soon as possible.

Sincerely,  
Dale L. Honea  
dalenv@hotmail.com  
Lamoille, NV 89828

**Comment Letter 029**

From: Benjamin Goode <supporter@supportcoeurrochester.com>  
Date: Thu, Sep 10, 2015 at 9:30 AM  
Subject: Comments on Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Allow me to voice my strong support for Coeur Rochester's expansion plan.

Less than 2% of the material encountered during mining of the Rochester Pit may be potentially acid generating. I support Coeur moving the in pit PAG material storage to the top of waste rock pile and think that the method of encapsulation proposed is conservative. This approach will help protect surface water and groundwater in the region. Therefore, I propose that Alternative I is selected as the preferred alternative in the EIS.

This expansion plan offers the environmental protection and economic stimulus that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Benjamin Goode  
benjamingoode@gmail.com  
Lake Zurich, IL 60047

**Comment Letter 030**

From: Misty Ruttenbur <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 9, 2015 at 9:42 AM  
Subject: Approve Plan of Operations Amendment 10  
To: wfoweb@blm.gov

Thank you for the opportunity to submit a comment regarding the Rochester Mine POA No. 10.

Alternative 1 should be the preferred alternative in the EIS because there are multiple PAG material storage areas in the pit currently. Consolidating them all into one makes sense and would help eliminate negative effects to the environment and make it easier to manage a consolidated unit.

Please do the right thing and make the expansion of mining at Coeur Rochester a reality. The region is counting on it.

Sincerely,  
Misty Ruttenbur  
mruttenbur@hotmail.com  
Winnemucca , NV 89445

**Comment Letter 031**

From: Robbin Lee <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 8, 2015 at 2:27 PM  
Subject: Rochester Mine POA No. 10  
To: wfoweb@blm.gov

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand operations and continue to employ Nevadans for another 5-7 years.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

The environmental impact will be insignificant and the economic impact will be substantial. Please approve Coeur Rochester's expansion plan as soon as possible. The United States needs domestic mining especially when it is done by responsible mining companies like Coeur.

Sincerely,  
Robbin Lee  
robbinlee01@comcast.net  
CENTENNIAL, CO 80015

**Comment Letter 032**

From: Jill stepper <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 9, 2015 at 9:47 PM  
Subject: Strong support for Coeur Rochester  
To: wfoweb@blm.gov

I appreciate the BLM offering this opportunity to comment on the Coeur Rochester plan to expand operations at the Rochester mine.

Coeur has Hazardous Materials and Waste Management Plans that are in effect and complete and, as per the Envirofacts Database search function on the EPA website, there is a pattern of compliance. So it seems like Coeur manages their wastes properly and I am in support of continued mining operations at Coeur Rochester.

This expansion plan offers the environmental protection, good jobs, economic stimulus and production of precious metal that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Jill stepper  
jill.stepper@yahoo.com  
Winnemucca, NV 89445

**Comment Letter 033**

From: George Byers <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 9, 2015 at 10:20 AM  
Subject: Please approve Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

I would like to add my voice to the many who strongly support the Coeur Rochester expansion plan.

One thing though: it makes no sense to re-handle and return PAG material into the pit as suggested in the proposed action. Alternative I is a sensible and reasonable alternative as it satisfactorily reduces the potential for future problems.

The environmental impact of this expansion and the selection of Alternative I will be insignificant, and the economic impact will be substantial. Please approve Coeur Rochester's expansion plan as soon as possible.

Sincerely,  
George Byers  
gbyers11@comcast.net  
Lakewood, CO 80228

**Comment Letter 034**

From: Felipe I. Guerrero Jr. <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 5:44 AM  
Subject: Approve Coeur Rochester's proposal  
To: wfoweb@blm.gov

Allow me to voice my strong support for Coeur Rochester's expansion plan.

Coeur has Hazardous Materials and Waste Management Plans that are in effect and complete and, as per the Envirofacts Database search function on the EPA website, there is a pattern of compliance. So it seems like Coeur manages their

wastes properly and I am in support of continued mining operations at Coeur Rochester.

Put simply: I strongly support Coeur Rochester's proposal to expand mining and urge you to make a favorable decision on POA 10 as soon as possible.

Sincerely,  
Felipe I. Guerrero Jr.  
fgjr752@gmail.com  
Fernley, NV 89408

**Comment Letter 035**

From: Sam Sutherland <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 12:07 PM  
Subject: Approve Coeur Rochester's proposal  
To: wfoweb@blm.gov

Please add my name to the list of those who support Coeur Rochester's expansion plans.

Alternative I should be the preferred alternative in the EIS because there are multiple PAG material storage areas in the pit currently. Consolidating them all into one makes sense and would help eliminate negative effects to the environment and make it easier to manage a consolidated unit.

This expansion plan offers the environmental protection and economic stimulus that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Sam Sutherland  
Samandmarnie@sbcglobal.net  
Reno, NV 89436

**Comment Letter 036**

From: Pauline R.Houston <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 5:12 PM  
Subject: Approve Coeur Rochester's proposal  
To: wfoweb@blm.gov

As a former employee and the mother of a current employee, I am in strong support of Coeur Mining's proposal to expand operations at the Rochester Mine and ask that you approve this plan as soon as possible.

Alternative I should be the preferred alternative in the EIS because there are multiple PAG material storage areas in the pit currently. Consolidating them all into one makes sense and would help eliminate negative effects to the environment and make it easier to manage a consolidated unit.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations.

Thank you.  
Sincerely,  
Pauline R. Houston  
thehoustons1970@sbcglobal.net  
LOVELOCK, NV 89419-1810

**Comment Letter 037**

From: Frank Rutherford <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 2:20 PM  
Subject: Coeur POA 10 Project (Rehberg)  
To: wfoweb@blm.gov

I appreciate the BLM offering this opportunity to comment on the Coeur Rochester plan to expand operations at the Rochester mine.

Coeur seems committed to environmental protection and stewardship and reports on its website that overall greenhouse gas emissions have reduced 24% since 2012. The EIS demonstrates that the proposed actions will have a negligible effect on climate change because Chapter 5 states that cumulative modeling results indicate that the ambient concentrations for all modeled criteria pollutants will be below the applicable NAAQS.

Please do the right thing and make the expansion of mining at Coeur Rochester a reality. The region is counting on it. Coeur Rochester employs a lot of people in the area. As a past County Commissioner for Pershing County, I know how hard it is find employment in the area and the City of Lovelock as well as the region need these jobs to maintain their status quo.

Sincerely,  
Frank Rutherford  
ramadafrank@hotmail.com  
Hamilton, MT 59840

**Comment Letter 038**

From: Jason Coyle <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 6:50 PM  
Subject: Comments on Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand operations and continue to employ Nevadans for another 5-7 years.

As described in Chapter 4 of the EIS in the Air Quality Sections, emissions from the proposed project would increase US CO<sub>2</sub>e emissions and global emissions, however, at the national and global scales this would result in a negligible impact. CRI has instituted best available technologies in their facilities design to control and reduce emissions and impacts to air quality from constituents like mercury, carbon, and other analytes.

This expansion plan offers the environmental protection and economic stimulus that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Jason Coyle  
CoyleJ1992@gmail.com  
Lovelock, NV 89419

**Comment Letter 039**

From: Frank Rutherford <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 2:12 PM  
Subject: Move forward with Coeur Rochester's expansion  
To: wfoweb@blm.gov

Thank you for allowing me to comment on the proposed expansion of the Coeur Rochester Mine.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

I urge you to approve and move forward with this expansion plan and approve POA 10 as quickly as possible.

Sincerely,  
Frank Rutherford  
ramadafrank  
, NV

**Comment Letter 040**

From: Misty Bickerdyke <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 2:43 PM  
Subject: Approve Coeur Rochester's proposal  
To: wfoweb@blm.gov

The best way to move forward at the Coeur Rochester Mine is for the BLM to approve Plan of Operations Amendment 10.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations. This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
Misty Bickerdyke  
cvmisty@yahoo.com  
Gardnerville, NV 89460

**Comment Letter 041**

From: John L.Andrus <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 9:11 AM  
Subject: Approve Coeur Rochester's proposal  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan that was submitted to BLM in June of 2013.

I appreciate that the POA 10 expansion was designed to avoid visual impacts to the Rochester Cultural District in Rochester Canyon. Even if visual impacts were to occur, it will complement the theme of the historic mining district.

Please move forward in approving this expansion plan in a timely manner. It's the right thing to do.

Sincerely,  
John L. Andrus  
xupe25jla@aol.com  
Spring Creek, NV 89815

**Comment Letter 042**

From: Karlee Meyers <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 9:18 PM  
Subject: Approve Coeur Rochester's proposal  
To: wfoweb@blm.gov

I am in strong support of Coeur Mining's proposal to expand operations at the Rochester Mine and ask that you approve this plan as soon as possible.

Coeur has Hazardous Materials and Waste Management Plans that are in effect and complete and, as per the Envirofacts Database search function on the EPA website, there is a pattern of compliance. So it seems like Coeur manages their wastes properly and I am in support of continued mining operations at Coeur Rochester.

The positive impact that the expansion of this mine will have on Pershing County and all of Nevada is very significant and I urge you to approve and move forward with this plan quickly.

Thank you.  
Sincerely,  
Karlee Meyers  
fredericks07@hotmail.com  
Reno, NV 89506

**Comment Letter 043**

From: Clinton R. Hutchcraft <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 10:06 AM

Subject: Approve Plan of Operations Amendment 10

To: wfoweb@blm.gov

Dear Sir or Madam,

Please include my comments as part of the public response to the proposed expansion of the Rochester Mine near Lovelock.

Thank you for addressing and analyzing potential impacts on air quality from mine emissions. Although the proposed action and alternatives would increase the atmospheric emissions of pollutants, Chapter 4 in the EIS identifies that emissions will still remain below regulated thresholds.

Please move forward in approving this expansion plan in a timely manner. It's the right thing to do.

Sincerely,  
Clinton R. Hutchcraft  
Hutchcraft\_Clinton\_R@Cat.com  
East Peoria, IL 61630

**Comment Letter 044**

From: Cameron B Shepherd <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 8:15 PM

Subject: Approve Plan of Operations Amendment 10

To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

I urge you to approve and move forward with Coeur Rochester's expansion plan and approve it as quickly as possible.

Sincerely,  
Cameron B Shepherd  
shepherdcameron1@Yahoo.com  
Winnemucca, NV

**Comment Letter 045**

From: Jamie Ray <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 5:29 PM  
Subject: Approve Plan of Operations Amendment 10  
To: wfoweb@blm.gov

Thank you for allowing me to comment on the proposed expansion of the Coeur Rochester Mine.

I disagree with Coeur Rochester's proposed action of moving the PAG material back into pit following mining.

Alternative 1 would decrease the potential for environmental degradation and should be considered for the preferred alternative.

Please approve the plan and make the expansion of mining at Rochester a reality.

Sincerely,  
Jamie Ray  
623 Mill St.  
Deer Lodge, MT 59722

**Comment Letter 046**

From: Tom Mahoney <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 9:30 PM  
Subject: Rochester Mine POA No. 10  
To: wfoweb@blm.gov

Count me among the supporters of Coeur Rochester's expansion plan.

As described in Chapter 4 of the EIS in the Air Quality Sections, emissions from the proposed project would increase US CO<sub>2</sub>e emissions and global emissions, however, at the national and global scales this would result in a negligible impact. CRI has instituted best available technologies in their facilities design to control and reduce emissions and impacts to air quality from constituents like mercury, carbon, and other analytes.

Put simply: I strongly support Coeur Rochester's proposal to expand mining and urge you to make a favorable decision on POA 10 as soon as possible.

Sincerely,  
Tom Mahoney  
tjmahoney71@yahoo.com  
Eureka, NV 89316

**Comment Letter 047**

From: dick williams <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 9:35 AM

Subject: Coeur Rochester's expansion

To: wfoweb@blm.gov

I'm writing to submit my thoughts about Coeur Rochester's plan to expand mining operations in Pershing County.

Although it appears that acid generation is unlikely given the geology and low acidity of the rock types found onsite, Coeur Rochester has gone above and beyond to ensure that sufficient measures are in place to monitor for unlikely ARD formation. As stated in Section 2.2.10 of the EIS, Coeur has also implemented new contingency measures should development of ARD be identified, which further demonstrates Coeur's commitment to environmental protections.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations. This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
dick williams  
dickwilliams@cashmanequipment.com  
Sparks, NV 89431

**Comment Letter 048**

From: Craig Davis <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 6:47 AM

Subject: Rochester Mine POA No. 10

To: wfoweb@blm.gov

Please add my name to the list of those who support Coeur Rochester's expansion plans.

I appreciate that the POA 10 expansion was designed to avoid visual impacts to the Rochester Cultural District in Rochester Canyon. Even if visual impacts were to occur, it will complement the theme of the historic mining district.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations. This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
Craig Davis  
gabby\_davis@sbcglobal.net  
Grass Valley, CA 95945

**Comment Letter 049**

From: Terasa Elerick <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 6:34 PM

Subject: Coeur Rochester's expansion

To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan that was submitted to BLM in June of 2013.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

Please do the right thing and make the expansion of mining at Coeur Rochester a reality. The region is counting on it.

Sincerely,

Terasa Elerick

terasa\_kiddos@yahoo.com

Lovelock, NV 89419

**Comment Letter 050**

From: Chantal Thomas <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 5:24 PM

Subject: Coeur Rochester's expansion

To: wfoweb@blm.gov

Thank you for the opportunity to submit a comment regarding the Rochester Mine POA No. 10.

It is unreasonable to consider moving the PAG material back into the pit as suggested in the proposed action.

Alternative 1 is a reasonable alternative because it reduces the potential for problems to occur and seems to have been well studied.

The environmental impact will be insignificant and the economic impact will be substantial. Please approve Coeur Rochester's expansion plan as soon as possible.

Sincerely,

Chantal Thomas

cthinasl389@yahoo.com

Winnemucca, NV 89445

**Comment Letter 051**

From: Cindy Paredes <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 9:23 PM  
Subject: Please approve Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

I am in strong support of Coeur Mining's proposal to expand operations at the Rochester Mine and ask that you approve this plan as soon as possible.

I support Alternative I because it makes sense to only handle the material once which will help limit surface area and exposure to oxygen creating an environment where ARD conditions could occur.

I urge you to approve and move forward with Coeur Rochester's expansion plan and approve it as quickly as possible.

Sincerely,  
Cindy Paredes  
Gramcin@yahoo.com  
Lovelock, NV 89419

**Comment Letter 052**

From: Tiffany <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 8:32 AM  
Subject: Coeur POA 10 Project (Rehberg)  
To: wfoweb@blm.gov

I am in strong support of Coeur Mining's proposal to expand operations at the Rochester Mine and ask that you approve this plan as soon as possible.

I appreciate that the POA 10 expansion was designed to avoid visual impacts to the Rochester Cultural District in Rochester Canyon. Even if visual impacts were to occur, it will complement the theme of the historic mining district.

The environmental impact will be insignificant and the economic impact will be substantial. Please approve Coeur Rochester's expansion plan as soon as possible.

Sincerely,  
Tiffany  
Jones  
Lovelock, NV 89419

**Comment Letter 053**

From: Debbie Culbertson <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 5:01 PM  
Subject: Please approve Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

Less than 2% of the material encountered during mining of the Rochester Pit may be potentially acid generating. I support Coeur moving the in pit PAG material storage to the top of waste rock pile and think that the method of encapsulation proposed is conservative. This approach will help protect surface water and groundwater in the region. Therefore, I propose that Alternative 1 is selected as the preferred alternative in the EIS.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations. This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
Debbie Culbertson  
billndebbie@frontiernet.net  
Kerby, OR 97531

**Comment Letter 054**

From: Tom Mahoney <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 9:31 PM  
Subject: Coeur POA 10 Project (Rehberg)  
To: wfoweb@blm.gov

I'm writing to submit my thoughts about Coeur Rochester's plan to expand mining operations in Pershing County.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations.

Thank you.  
Sincerely,  
Tom Mahoney  
tjmahoney71@yahoo.com  
Eureka, NV 89316

**Comment Letter 055**

From: Celeste V Smith <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 7:30 PM  
Subject: Coeur POA 10 Project (Rehberg)  
To: wfoweb@blm.gov

Please include my comments as part of the public response to the proposed expansion of the Rochester Mine near Lovelock.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations.

This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
Celeste V Smith  
smith\_celeste@yahoo.com  
Lovelock , NV 89419

**Comment Letter 056**

From: Briana Cleland <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 10:26 PM  
Subject: Coeur Rochester's plan  
To: wfoweb@blm.gov

The best way to move forward at the Coeur Rochester Mine is for the BLM to approve Plan of Operations Amendment 10.

I support Alternative I because it makes sense to only handle the material once which will help limit surface area and exposure to oxygen creating an environment where ARD conditions could occur.

Please do the right thing and make the expansion of mining at Coeur Rochester a reality. The region is counting on it.

Sincerely,  
Briana Cleland  
Bribricleland@gmail.com  
Winnemucca , NV 89445

**Comment Letter 057**

From: Jessica Blanchard <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 5:47 PM  
Subject: Strong support for Coeur Rochester  
To: wfoweb@blm.gov

Please include my comments as part of the public response to the proposed expansion of the Rochester Mine near Lovelock.

As described in Chapter 4 of the EIS in the Air Quality Sections, emissions from the proposed project would increase US CO<sub>2</sub>e emissions and global emissions, however, at the national and global scales this would result in a negligible impact. CRI has instituted best available technologies in their facilities design to

control and reduce emissions and impacts to air quality from constituents like mercury, carbon, and other analytes.

Coeur Rochester's plan will protect much-needed jobs, stimulate the local and regional economy, increase tax revenues and protect the environment. Please approve this expansion plan as soon as possible.

Sincerely,  
Jessica Blanchard  
coree616@yahoo.com  
winnemucca, NV 89446

**Comment Letter 058**

From: Kristie Drake <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 11:18 AM  
Subject: Proposed expansion of the Coeur Rochester Mine  
To: wfoweb@blm.gov

Thank you for the opportunity to submit a comment regarding the Rochester Mine POA No. 10.

From reviewing the EIS, I understand there will be no effects to air quality beyond the proposed mine plan boundary, which would 1) not impact surrounding wildlife habitat and 2) limit dust to the existing disturbed areas. Further, with the existing dust control measures in place, the emissions would be localized and won't affect the scenic value of the area.

This expansion plan offers the environmental protection and economic stimulus that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Kristie Drake  
poohbear1561@yahoo.com  
winnemucca, NV 89445

**Comment Letter 059**

From: Daphne mills <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 7:17 AM  
Subject: Proposed expansion of the Coeur Rochester Mine  
To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

I support Alternative 1 because it makes sense to only handle the material once which will help limit surface area and exposure to oxygen creating an environment where ARD conditions could occur.

Please approve the plan and make the expansion of mining at Rochester a reality.

Sincerely,  
Daphne mills  
Daphne.mills90@gmail.com  
Lovelock , NV 89419

**Comment Letter 060**

From: Douglas Tadd Shields <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 8:46 PM  
Subject: Proposed expansion of the Coeur Rochester Mine  
To: wfoweb@blm.gov

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand operations and continue to employ Nevadans for another 5-7 years.

The EIS appears to have thoroughly addressed potential impacts to cultural resources. One historic site would be visually and directly impacted and one multi-component site would be directly impacted. But, the mitigation that BLM has designed will make these impacts insignificant and I am in support of the proposed expansion.

The positive impact that the expansion of this mine will have on Pershing County and all of Nevada is very significant and I urge you to approve and move forward with this plan quickly. Thank you.

Sincerely,  
Douglas Tadd Shields  
Taddshields@cashmanequipment.com  
Winnemucca, NV 89445

**Comment Letter 061**

From: gus duncan <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 6:51 PM  
Subject: Proposed expansion of the Coeur Rochester Mine  
To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

Alternative I should be the preferred alternative in the EIS because there are multiple PAG material storage areas in the pit currently. Consolidating them all into one makes sense and would help eliminate negative effects to the environment and make it easier to manage a consolidated unit.

Put simply: I strongly support Coeur Rochester's proposal to expand mining and urge you to make a favorable decision on POA I0 as soon as possible.

Sincerely,  
gus duncan  
duncangbgs5@Yahoo.com  
winnemucca, NV 89445

**Comment Letter 062**

From: Travis Phillips <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 6:46 PM  
Subject: Proposed expansion of the Coeur Rochester Mine  
To: wfoweb@blm.gov

Allow me to voice my strong support for Coeur Rochester's expansion plan.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations. Thank you.

Sincerely,  
Travis Phillips  
travp\_10@yahoo.com  
lovelock, NV 89419

**Comment Letter 063**

From: Tressa Bryson <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 11:05 AM  
Subject: Comments on Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Coeur Rochester's operation results in positive economic and environment conditions that strengthen our surrounding areas and communities. Please approve Amendment 10.

As described in Chapter 4 of the EIS in the Air Quality Sections, emissions from the proposed project would increase US CO<sub>2</sub>e emissions and global emissions, however, at the national and global scales this would result in a negligible impact. CRI has instituted best available technologies in their facilities design to control and reduce emissions and impacts to air quality from constituents like mercury, carbon, and other analytes.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations. Thank you.

Sincerely,  
Tressa Bryson  
Ak2nv2008@gmail.com  
Lovelock, NV 89419

**Comment Letter 064**

From: Michael Brenner <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 9:24 AM

Subject: Comments on Coeur Rochester's expansion plan

To: wfoweb@blm.gov

Coeur Rochester's operation results in positive economic and environment conditions that strengthen our surrounding areas and communities. Please approve Amendment 10.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

I urge you to approve and move forward with Coeur Rochester's expansion plan and approve it as quickly as possible.

Sincerely,  
Michael Brenner  
mikebrenner@cashmanequipment.com  
Reno, NV 89431

**Comment Letter 065**

From: Rachel Clingan <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 10:48 AM

Subject: Coeur Rochester Mine POA10 DEIS Comments

To: wfoweb@blm.gov

Thank you for the opportunity to submit a comment regarding the Rochester Mine POA No. 10.

I worked at Coeur Rochester for over 18 years, and I whole-heartedly support the expansion project. Coeur is a responsible mining corporation with an excellent reputation and true values to protect and preserve the environment and to provide a safe work environment.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

Put simply: I strongly support Coeur Rochester's proposal to expand mining and urge you to make a favorable decision on POA 10 as soon as possible.

Sincerely,  
Rachel Clingan  
rclingan@barrick.com  
Lovelock, NV 89419

**Comment Letter 066**

From: Shawn Rutherford <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 4:59 PM  
Subject: Approve Plan of Operations Amendment I0  
To: wfoweb@blm.gov

Coeur Rochester's operation results in positive economic and environment conditions that strengthen our surrounding areas and communities. Please approve Amendment I0.

Less than 2% of the material encountered during mining of the Rochester Pit may be potentially acid generating. I support Coeur moving the in pit PAG material storage to the top of waste rock pile and think that the method of encapsulation proposed is conservative. This approach will help protect surface water and groundwater in the region. Therefore, I propose that Alternative I is selected as the preferred alternative in the EIS.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations. This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
Shawn Rutherford  
insatiablysassy@yahoo.com  
Hamilton, MT 59840

**Comment Letter 067**

From: Brooke Huotte <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 5:51 PM  
Subject: Comments on Rochester Mine near Lovelock  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan and extend the life of the mine by five to seven years.

Alternative I should be the preferred alternative in the EIS because there are multiple PAG material storage areas in the pit currently. Consolidating them all into one makes sense and would help eliminate negative effects to the environment and make it easier to manage a consolidated unit.

Please move forward in approving this expansion plan in a timely manner. It's the right thing to do.

Sincerely,  
Brooke Huotte  
Brookehuotte@yahoo.com  
Winnemucca , NV 89445

**Comment Letter 068**

From: CHRISTINA RODARTE <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 6:53 AM  
Subject: Coeur Rochester Mine POA10 DEIS Comments  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan and extend the life of the mine by five to seven years.

As described in Chapter 4 of the EIS in the Air Quality Sections, emissions from the proposed project would increase US CO<sub>2</sub>e emissions and global emissions, however, at the national and global scales this would result in a negligible impact. CRI has instituted best available technologies in their facilities design to control and reduce emissions and impacts to air quality from constituents like mercury, carbon, and other analytes.

The environmental impact will be insignificant and the economic impact will be substantial. Please approve Coeur Rochester's expansion plan as soon as possible.

Sincerely,  
CHRISTINA RODARTE  
sedonarodarte@yahoo.com  
FERNLEY, NV 89408

**Comment Letter 069**

From: Dawn Randolph <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 7:17 AM  
Subject: Approve Plan of Operations Amendment 10  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan and extend the life of the mine by five to seven years.

Although it appears that acid generation is unlikely given the geology and low acidity of the rock types found onsite, Coeur Rochester has gone above and beyond to ensure that sufficient measures are in place to monitor for unlikely ARD formation. As stated in Section 2.2.10 of the EIS, Coeur has also implemented new contingency measures should development of ARD be identified, which further demonstrates Coeur's commitment to environmental protections.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations. Thank you.

Sincerely,  
Dawn Randolph  
nwade0727@yahoo.com  
Lovelock, NV 89419

**Comment Letter 070**

From: Aaron <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 9:26 PM

Subject: Approve Plan of Operations Amendment 10

To: wfoweb@blm.gov

Coeur Rochester's operation results in positive economic and environment conditions that strengthen our surrounding areas and communities. Please approve Amendment 10.

I disagree with Coeur Rochester's proposed action of moving the PAG material back into pit following mining. Alternative 1 would decrease the potential for environmental degradation and should be considered for the preferred alternative.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations. Thank you.

Sincerely,

Aaron

Aaron\_scilacci@yahoo.com

Lovelock, NV 89419

**Comment Letter 071**

From: Damon Tupa <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 8:15 PM

Subject: I support Coeur Rochester

To: wfoweb@blm.gov

Coeur Rochester's operation results in positive economic and environment conditions that strengthen our surrounding areas and communities. Please approve Amendment 10.

It is unreasonable to consider moving the PAG material back into the pit as suggested in the proposed action. Alternative 1 is a reasonable alternative because it reduces the potential for problems to occur and seems to have been well studied.

Thank you for the opportunity to make my comments heard. Please make the Coeur Rochester expansion happen soon.

Sincerely,

Damon Tupa

damontupa@yahoo.com

lovelock, NV 89419

**Comment Letter 072**

From: Jim and Pat Rowe <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 9:12 PM

Subject: Approve Plan of Operations Amendment 10

To: wfoweb@blm.gov

Thank you for the opportunity to submit a comment regarding the Rochester Mine POA No. 10.

The EIS appears to have thoroughly addressed potential impacts to cultural resources. One historic site would be visually and directly impacted and one multi-component site would be directly impacted. But, the mitigation that BLM has designed will make these impacts insignificant and I am in support of the proposed expansion.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations.

This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
Jim and Pat Rowe  
jprowe@gbis.com  
lovelock, NV 89419

**Comment Letter 073**

From: Iain Webb <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 9:05 PM

Subject: Approve Plan of Operations Amendment 10

To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan that was submitted to BLM in June of 2013.

Although it appears that acid generation is unlikely given the geology and low acidity of the rock types found onsite, Coeur Rochester has gone above and beyond to ensure that sufficient measures are in place to monitor for unlikely ARD formation. As stated in Section 2.2.10 of the EIS, Coeur has also implemented new contingency measures should development of ARD be identified, which further demonstrates Coeur's commitment to environmental protections.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations. This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
Iain Webb  
lainw23@yahoo.com  
Gardnerville , NV 89460

**Comment Letter 074**

From: Tate Morehead <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 8:15 PM  
Subject: Approve Plan of Operations Amendment 10  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan and extend the life of the mine by five to seven years.

I disagree with Coeur Rochester's proposed action of moving the PAG material back into pit following mining.

Alternative 1 would decrease the potential for environmental degradation and should be considered for the preferred alternative.

Let's get moving as quickly as possible to make this expansion happen. It's the best thing for the environment, great for Pershing County and much needed for our economy and tax base.

Sincerely,  
Tate Morehead  
Slopestyle22@hotmail.com  
Fernley, NV 89408

**Comment Letter 075**

From: J.V.Culbertson <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 5:04 PM  
Subject: Approve Plan of Operations Amendment 10  
To: wfoweb@blm.gov

Thank you for the opportunity to submit a comment regarding the Rochester Mine POA No. 10.

I appreciate that the POA 10 expansion was designed to avoid visual impacts to the Rochester Cultural District in Rochester Canyon. Even if visual impacts were to occur, it will complement the theme of the historic mining district.

I urge you to approve and move forward with Coeur Rochester's expansion plan and approve it as quickly as possible.

Sincerely,  
J.V. Culbertson  
billndebbie@frontiernet.net  
Kerby, OR 97531

**Comment Letter 076**

From: Robin DeVisser <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 9:36 AM

Subject: Rochester Mine POA No. 10

To: wfoweb@blm.gov

I am in strong support of Coeur Mining's proposal to expand operations at the Rochester Mine and ask that you approve this plan as soon as possible.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations. This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
Robin DeVisser  
robin\_devisser@cashmanfluidsanalysis.com  
Sparks, NV 89436

**Comment Letter 077**

From: Candice Sweeney <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 8:12 AM

Subject: Rochester Mine POA No. 10

To: wfoweb@blm.gov

Thank you for allowing me to comment on the proposed expansion of the Coeur Rochester Mine.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

The environmental impact will be insignificant and the economic impact will be substantial. Please approve Coeur Rochester's expansion plan as soon as possible.

Sincerely,  
Candice Sweeney  
candi\_sweeney@cashmanequipment.com  
Sparks, NV 89431

**Comment Letter 078**

From: Chris C. Wolford <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 8:52 AM

Subject: Coeur Rochester's expansion

To: wfoweb@blm.gov

I appreciate the BLM offering this opportunity to comment on the Coeur Rochester plan to expand operations at the Rochester mine.

Thank you for addressing and analyzing potential impacts on air quality from mine emissions. Although the proposed action and alternatives would increase the atmospheric emissions of pollutants, Chapter 4 in the EIS identifies that emissions will still remain below regulated thresholds.

Let's get moving as quickly as possible to make this expansion happen. It's the best thing for the environment, great for Pershing County and much needed for our economy and tax base.

This expansion also provides much needed employment opportunities for Nevadan's in an area where many have already lost their jobs.

Sincerely,  
Chris C. Wolford  
ccwolford@hotmail.com  
Elko NV, NV 89801

**Comment Letter 079**

From: Rafael Medina <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 5:47 AM

Subject: Coeur Rochester's expansion

To: wfoweb@blm.gov

Coeur Rochester's operation results in positive economic and environment conditions that strengthen our surrounding areas and communities. Please approve Amendment 10.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

The environmental impact will be insignificant and the economic impact will be substantial. Please approve Coeur Rochester's expansion plan as soon as possible.

Sincerely,  
Rafael Medina  
rmedina@coeur.com  
Lovelock, NV 89419

**Comment Letter 080**

From: Kenneth Story <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 9:58 PM

Subject: Coeur Rochester's expansion

To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

It is unreasonable to consider moving the PAG material back into the pit as suggested in the proposed action.

Alternative 1 is a reasonable alternative because it reduces the potential for problems to occur and seems to have been well studied.

Let's get moving as quickly as possible to make this expansion happen. It's the best thing for the environment, great for Pershing County and much needed for our economy and tax base.

Sincerely,  
Kenneth Story  
teddawg@sbcglobal.net  
Lovelock, NV 89419

**Comment Letter 081**

From: Emily horn <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 8:05 PM

Subject: Coeur Rochester's expansion

To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan that was submitted to BLM in June of 2013.

Thank you for addressing and analyzing potential impacts on air quality from mine emissions. Although the proposed action and alternatives would increase the atmospheric emissions of pollutants, Chapter 4 in the EIS identifies that emissions will still remain below regulated thresholds.

I urge you to approve and move forward with this expansion plan and approve POA 10 as quickly as possible.

Sincerely,  
Emily horn  
ehorn2002@gmail.com  
Lovelock , NV 89419

**Comment Letter 082**

From: John & Robin Kieber <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 7:07 PM  
Subject: Coeur Rochester's expansion  
To: wfoweb@blm.gov

Please include my comments as part of the public response to the proposed expansion of the Rochester Mine near Lovelock.

From reviewing the EIS, I understand there will be no effects to air quality beyond the proposed mine plan boundary, which would 1) not impact surrounding wildlife habitat and 2) limit dust to the existing disturbed areas. Further, with the existing dust control measures in place, the emissions would be localized and won't affect the scenic value of the area.

Please approve the plan and make the expansion of mining at Rochester a reality.

Sincerely,  
John & Robin Kieber  
rkieber@aol.com  
Winnemucca, NV 89445

**Comment Letter 083**

From: Terry Haygood <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 8:48 AM  
Subject: Please approve Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Thank you for allowing me to comment on the proposed expansion of the Coeur Rochester Mine.

As described in Chapter 4 of the EIS in the Air Quality Sections, emissions from the proposed project would increase US CO<sub>2</sub>e emissions and global emissions, however, at the national and global scales this would result in a negligible impact. CRI has instituted best available technologies in their facilities design to control and reduce emissions and impacts to air quality from constituents like mercury, carbon, and other analytes.

I urge you to approve and move forward with this expansion plan and approve POA 10 as quickly as possible.

Sincerely,  
Terry Haygood  
terry\_haygood@cashmanequipment.com  
Winnemucca, NV 89445

**Comment Letter 084**

From: matthew woolsey <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 5:45 AM

Subject: Please approve Coeur Rochester's expansion plan

To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

Although it appears that acid generation is unlikely given the geology and low acidity of the rock types found onsite, Coeur Rochester has gone above and beyond to ensure that sufficient measures are in place to monitor for unlikely ARD formation. As stated in Section 2.2.10 of the EIS, Coeur has also implemented new contingency measures should development of ARD be identified, which further demonstrates Coeur's commitment to environmental protections.

Please approve the plan and make the expansion of mining at Rochester a reality.

Sincerely,  
matthew woolsey  
Woolsey339@gmail.com  
winnemucca , NV 89445

**Comment Letter 085**

From: Rusty Hufford <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 9:41 PM

Subject: Please approve Coeur Rochester's expansion plan

To: wfoweb@blm.gov

Coeur Rochester's operation results in positive economic and environment conditions that strengthen our surrounding areas and communities. Please approve Amendment 10.

I disagree with Coeur Rochester's proposed action of moving the PAG material back into pit following mining. Alternative I would decrease the potential for environmental degradation and should be considered for the preferred alternative.

The environmental impact will be insignificant and the economic impact will be substantial.

Please approve Coeur Rochester's expansion plan as soon as possible.

Sincerely,  
Rusty Hufford  
Rhufford@gmail  
Winnemucca, NV 89445

**Comment Letter 086**

From: Wendy Schlyer <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 6:34 PM

Subject: Please approve Coeur Rochester's expansion plan

To: wfoweb@blm.gov

Thank you for the opportunity to submit a comment regarding the Rochester Mine POA No. 10.

Alternative I should be the preferred alternative in the EIS because there are multiple PAG material storage areas in the pit currently. Consolidating them all into one makes sense and would help eliminate negative effects to the environment and make it easier to manage a consolidated unit.

The environmental impact will be insignificant and the economic impact will be substantial. Please approve Coeur Rochester's expansion plan as soon as possible.

Sincerely,  
Wendy Schlyer  
wschlyer@coeur.com  
Winnemucca , NV 89445

**Comment Letter 087**

From: Penny Labahn <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 7:07 AM

Subject: I support Coeur Rochester

To: wfoweb@blm.gov

Please add my name to the list of those who support Coeur Rochester's expansion plans.

Coeur seems committed to environmental protection and stewardship and reports on its website that overall greenhouse gas emissions have reduced 24% since 2012. The EIS demonstrates that the proposed actions will have a negligible effect on climate change because Chapter 5 states that cumulative modeling results indicate that the ambient concentrations for all modeled criteria pollutants will be below the applicable NAAQS.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations.

Thank you.  
Sincerely,  
Penny Labahn  
pennyoxborne@hotmail.com  
Fairbanks, AK 99708

**Comment Letter 088**

From: Vanessa Quinlan <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 5:10 PM  
Subject: Comments on Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Coeur Rochester's operation results in positive economic and environment conditions that strengthen our surrounding areas and communities. Please approve Amendment 10.

Alternative 1 should be the preferred alternative in the EIS because there are multiple PAG material storage areas in the pit currently. Consolidating them all into one makes sense and would help eliminate negative effects to the environment and make it easier to manage a consolidated unit.

Let's get moving as quickly as possible to make this expansion happen. It's the best thing for the environment, great for Pershing County and much needed for our economy and tax base.

Sincerely,  
Vanessa Quinlan  
vanessanavarro11@yahoo.com  
nampa, ID 83686

**Comment Letter 089**

From: Paula henderson <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 3:57 AM  
Subject: Coeur Rochester's plan  
To: wfoweb@blm.gov

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand operations and continue to employ Nevadans for another 5-7 years.

The EIS appears to have thoroughly addressed potential impacts to cultural resources. One historic site would be visually and directly impacted and one multi-component site would be directly impacted. But, the mitigation that BLM has designed will make these impacts insignificant and I am in support of the proposed expansion.

Coeur Rochester's plan will protect much-needed jobs, stimulate the local and regional economy, increase tax revenues and protect the environment. Please approve this expansion plan as soon as possible.

Sincerely,  
Paula henderson  
artrockllc24@yahoo.com  
Ash Fork, AZ 86320

**Comment Letter 090**

From: William Miller III <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 3:09 PM  
Subject: Approve Coeur Rochester's proposal  
To: wfoweb@blm.gov

Count me among the supporters of Coeur Rochester's expansion plan. Thank you for addressing and analyzing potential impacts on air quality from mine emissions. Although the proposed action and alternatives would increase the atmospheric emissions of pollutants, Chapter 4 in the EIS identifies that emissions will still remain below regulated thresholds.

The positive impact that the expansion of this mine will have on Pershing County and all of Nevada is very significant and I urge you to approve and move forward with this plan quickly.  
Thank you

Sincerely,  
William Miller III  
Wmiller210@yahoo.com  
Silver Springs , NV 89429

**Comment Letter 091**

From: Michael j marin <supporter@supportcoeurrochester.com>  
Date: Thu, Sep 17, 2015 at 9:51 AM  
Subject: Approve Coeur Rochester's proposal  
To: wfoweb@blm.gov

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand operations and continue to employ Nevadans for another 5-7 years.

It is unreasonable to consider moving the PAG material back into the pit as suggested in the proposed action. Alternative I is a reasonable alternative because it reduces the potential for problems to occur and seems to have been well studied.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations. Thank you.

Sincerely,  
Michael j marin  
Marin4188@yahoo.com  
Fernley , NV 89408

**Comment Letter 092**

Date: Wed, Sep 16, 2015 at 4:02 PM  
Subject: Proposed expansion of the Coeur Rochester Mine  
To: wfoweb@blm.gov

Coeur Rochester's operation results in positive economic and environment conditions that strengthen our surrounding areas and communities. Please approve Amendment 10.

Coeur seems committed to environmental protection and stewardship and reports on its website that overall greenhouse gas emissions have reduced 24% since 2012. The EIS demonstrates that the proposed actions will have a negligible effect on climate change because Chapter 5 states that cumulative modeling results indicate that the ambient concentrations for all modeled criteria pollutants will be below the applicable NAAQS.

Please approve the plan and make the expansion of mining at Rochester a reality.

Sincerely,  
Greg Robinson  
grego44@hotmail.com  
Fallon, NV 89406

**Comment Letter 093**

From: Monte Hammon <supporter@supportcoeurrochester.com>  
Date: Thu, Sep 17, 2015 at 6:59 AM  
Subject: Coeur Rochester Mine POA10 DEIS Comments  
To: wfoweb@blm.gov

Please add my name to the list of those who support Coeur Rochester's expansion plans.

It is unreasonable to consider moving the PAG material back into the pit as suggested in the proposed action.

Alternative 1 is a reasonable alternative because it reduces the potential for problems to occur and seems to have been well studied.

This expansion plan offers the environmental protection and economic stimulus that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Monte Hammon  
monte\_hammon@cashmanequipment.com  
Winnemucca, NV 89445

**Comment Letter 094**

From: <supporter@supportcoeurrochester.com>  
Date: Thu, Sep 17, 2015 at 7:16 AM  
Subject: Please approve Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Count me among the supporters of Coeur Rochester's expansion plan.

Although it appears that acid generation is unlikely given the geology and low acidity of the rock types found onsite, Coeur Rochester has gone above and beyond to ensure that sufficient measures are in place to monitor for unlikely ARD formation. As stated in Section 2.2.10 of the EIS, Coeur has also implemented new contingency measures should development of ARD be identified, which further demonstrates Coeur's commitment to environmental protections.

Let's get moving as quickly as possible to make this expansion happen. It's the best thing for the environment, great for Pershing County and much needed for our economy and tax base.

Sincerely,  
Joseph\_edwards@cashmanequipment.com  
winnemucca, NV 89446

**Comment Letter 095**

From: Heather Ellis <supporter@supportcoeurrochester.com>  
Date: Thu, Sep 17, 2015 at 9:57 AM  
Subject: I support Coeur Rochester  
To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

It is unreasonable to consider moving the PAG material back into the pit as suggested in the proposed action.

Alternative 1 is a reasonable alternative because it reduces the potential for problems to occur and seems to have been well studied.

I urge you to approve and move forward with Coeur Rochester's expansion plan and approve it as quickly as possible.

Sincerely,  
Heather Ellis  
Heather-ellis@live.com  
Lovelock, NV 89419

**Comment Letter 096**

STATE OF NEVADA  
DEPARTMENT OF WILDLIFE  
Fallon Field Office  
380 West B Street  
Fallon, Nevada 89406  
(775) 423-3171 Fax (775) 423-8171

Kathleen Rehberg  
Geologist  
Bureau of Land Management  
Winnemucca District  
Humboldt River Field Office

Re; Coeur Rochester Mine Area 10 Amendment and Closure Plan (DEIS, E2016-013)

Ms. Rehberg:

The recent Environmental Impact Statement (DEIS, E2016-013) for the Coeur Rochester Mine Area 10 Amendment and Closure Plan brings to light some questions regarding the Winnemucca Bureau of Land Management (BLM) district's commitment to conservation of several of its special status species, including the Preble's shrew (*Sorex preblei*). Though we focus on Preble's shrew in this letter, we also recommend that BLM review EIS conservation measures (for example, appropriate buffer distances, survey protocols, and seasonal activity windows) for other special status species, including burrowing owls (*Athene cunicularia*). We have reviewed the DEIS and have several follow up questions and concerns.

From section five of the DEIS, we understand that American Spring will be covered, resulting in the permanent removal of this spring and the removal of "approximately 81 acres of modeled high potential Preble's shrew priority habitat ... representing approximately 11 percent of modeled high potential habitat in the project area." Though section 5-26 states that no mitigation is being proposed for this habitat loss, section 5-27 states that "mitigation measures described in Chapter 6 would further minimize potential impacts on special status species, including Preble's shrew." Below, we request clarification as to 1) whether mitigation is being proposed and 2) if mitigation is proposed, how those measures will promote Preble's shrew conservation. Despite these mitigation measures, BLM acknowledges that incremental effects may still occur to special status species. BLM describes these mitigation measures or environmental protection measures if habitat is disturbed under this project. As we understand it, mitigation measures include the following actions: 1) an " ... an equal amount of potential shrew habitat [81 acres] would be surveyed for three seasons (spring, summer, and fall)" and 2) reclamation of "disturbed potential shrew habitat" with a "recommended seed mix that would support the shrew's habitat." We request further clarification per the following questions:

Does BLM intend to mitigate for Preble's shrew? If so, what is the objective of that mitigation and how will it contribute to long-term conservation of Preble's shrew populations and associated habitats?

The document states that a survey of 81 acres of potential shrew habitat will be surveyed for three seasons in one year following the removal of 81 acres in the mine amendment area. We have concerns that this survey approach of only 3 seasons in a single year will not provide adequate knowledge of species presence and status. Where will these surveys be located? While NDOW

recognizes that gathering and analyzing information are crucial first steps for species protection and for effective conservation, it is important that survey programs be designed with clear objectives, methods, and deliverables in order to yield as accurate information as possible about a species. As presented in this document, it is unclear that the completion of surveys across 81 acres for 15 days (5 trapping days in 3 seasons per the protocol referenced above) in an undisclosed location is likely to provide information commensurate with the potential entire loss of a population. In addition, the protocol mentioned in the EIS pertains only to shrew trapping, but does not provide guidance for vegetation surveys and decisions about seed mixtures designed to provide for suitable Preble's shrew habitat at either a local or regional scale. While we support this type of endeavor and realize that a well-designed survey program is a first step, it seems unlikely that the activities outlined in the EIS will yield significant advancements in conservation of a special status species. We feel that the plans outlined in this document, in addition to permanent removal of habitat, will likely yield population loss in this area without providing benefits for regional populations.

BLM provides for reclamation of disturbed potential shrew habitat with a recommended seed mixture that would provide habitat for Preble's shrew. We would like further specifics on how this would provide habitat as little is known about habitat requirements for Preble's shrew. Where would this reclamation site be located? If the reclamation site includes the 81 acres, will American Canyon Spring be reclaimed and how will the seed mixture be determined? If so, what are the benchmarks of reclamation success? If the spring cannot be reclaimed (i.e. infiltration and flows returned to pre-EIS levels, appropriate water quality, etc.), how will the use of a seed mix promote shrew conservation, especially if shrews have been extirpated due to the permanent habitat loss described here? What are the benchmarks for successful Preble's shrew conservation and, will there be a monitoring plan to test if the mitigation measures (reclamation) have met these benchmarks? If post-project monitoring is not planned, how will BLM decide if the mitigation measures proposed here are effective and worth pursuing in subsequent projects?

We appreciate your consideration of the above questions and concerns and replies can be sent to Kenny Pirkle at the address listed above. As Preble's shrew is a Species of Conservation Priority for the Nevada Department of Wildlife as well as a Special Status Species for Winnemucca BLM, we are dedicated to ensuring that effective conservation measures follow permanent loss of habitat. Again, thank you for allowing NDOW to comment on the Coeur Rochester Mine Area 10 Amendment and Closure Plan Draft EIS.

Sincerely  
Kenny Pirkle  
Biologist, Habitat Division

**Comment Letter 097**

PERSHING COUNTY BOARD OF COMMISSIONERS

P. O. Drawer E  
Lovelock, NV 89419  
775-273-2342

September 29, 2015

Ms. Kathleen Rehberg, Project Lead  
BLM-Winnemucca District Office  
5100 East Winnemucca Blvd.  
Winnemucca, NV 89445

RE: "Coeur Rochester, Inc.-Application to Modify Nevada Water Pollution Control Permit (NEV0050037)"

Dear Ms. Rehberg:

Pershing County would like to go on record as totally in support of the "Coeur Rochester, Inc.- Application to Modify Nevada Water Pollution Control Permit (NEV0050037)". Coeur Rochester Inc. is a valued asset to our community. The commission has been given an update at our regular commission meeting by Coeur Rochester Inc. and has determined that the commission is in support of the project.

Pershing County desires to be a coordinating and cooperating agency.

The County has had a very positive interaction with the Coeur Rochester, Inc. management team in the past and we look forward to continuing our great relationship in the future.

Sincerely,  
PERSHING COUNTY BOARD OF COMMISSIONERS  
Darin Bloyed  
Darin Bloyed, Chairman  
e-mailed: [wfoweb@blm.gov](mailto:wfoweb@blm.gov)

**Comment Letter 098**

Nevada State Clearinghouse  
*Department of Conservation and Natural Resources*  
901 South Stewart Street, Suite 5003  
Carson City, NV 89701  
775-684-2723  
<http://clearinghouse.nv.gov>  
[www.lands.nv.gov](http://www.lands.nv.gov)

DATE: 8/28/2015  
Division of Water Resources  
Nevada SAI # E2016-013

Project: DEIS - Coeur Rochester Mine Area 10 Amendment and Closure Plan - Pershing County

\_\_\_\_\_ No comment on this project   X   Proposal supported as written

**AGENCY COMMENTS:**

All waters of the State belong to the public and may be appropriated for beneficial use pursuant to the provisions of Chapters 533 and 534 of the Nevada Revised Statutes (NRS), and not otherwise. Any water used on the described lands should be provided by an established utility or under permit issued by the State Engineer's Office. Any water or monitor wells, or boreholes that may be located on either acquired or transferred lands are the ultimate responsibility of the owner of the property at the time of the transfer and must be plugged and abandoned as required in Chapter 534 of the Nevada Administrative Code. If artesian water is encountered in any well or borehole it shall be controlled as required in NRS §534.060(3). Any water used on the described project for construction, dust control, or maintenance should be provided by an established utility or under permit or waiver issued by the State Engineer's Office.

Any person proposing to construct a dam, reconstruction or alteration of old structures in this state shall, before beginning construction, obtain from the State Engineer a permit to appropriate, store and use the water to be impounded by or diverted by the dam. If the proposed dam is or will be 20 feet or more in height, measured from the downstream toe to the crest of the dam, or is less than 20 feet in height and will impound more than 20 acre-feet of water, must submit to the State Engineer in triplicate plans and specifications thereof for his approval in accordance with Nevada Revised Statue Chapter 535 and Nevada Administrative Code Chapter 535 prior to construction is to begin.

A review of the area, Hydrographic Basin No. 129, Buena Vista Valley, indicates there are multiple active water rights in the vicinity of the described lands in this proposed project and currently owned by Coeur-Rochester Inc. Any changes in Manner of Use, Place of Use or Point of Diversion will require applications to change and approval of the applications.

Ian Kono

**Comment Letter 099**

DATE: September 2, 2015

TO: Nevada State Clearinghouse, DCNR

FROM: Nevada Division of Environmental Protection, Bureau of Water Pollution Control

SUBJECT: State Clearinghouse Comments for E2016-013 (DEIS - Coeur Rochester Mine Area 10 Amendment and Closure Plan - Pershing County)

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Disclaimer: The Nevada Division of Environmental Protection (NDEP), Bureau of Water

Pollution Control (BWPC) does not have authority for projects occurring on Tribal Lands.

The NDEP, BWPC has received the aforementioned State Clearinghouse item and offers the following comments:

The project may be subject to BWPC permitting. Permits are required for discharges to surface waters and groundwater's of the State (Nevada Administrative Code NAC 445A.228). BWPC permits include, but are not limited to, the following:

- Stormwater Industrial General Permit
- De Minimis Discharge General Permit
- Pesticide General Permit
- Drainage Well General Permit
- Temporary Permit for Discharges to Groundwater's of the State
- Working in Waters Permit
- Wastewater Discharge Permits
- Underground Injection Control Permits
- Onsite Sewage Disposal System Permits
- Holding Tank Permits

Please note that discharge permits must be issued from this Division before construction of any treatment works (Nevada Revised Statute 445A.585).

For more information on BWPC Permitting, please visit our website at: <http://ndep.nv.gov/bwpc/index.htm>.

Additionally, the applicant is responsible for all other permits that may be required, which may include, but not be limited to:

- Dam Safety Permits - Division of Water Resources
- Well Permits - Division of Water Resources
- 401 Water Quality Certification - NDEP
- 404 Permits - U.S. Army Corps of Engineers
- Air Permits - NDEP
- Health Permits - Local Health or State Health Division
- Local Permits - Local Government

Thank you for the information and the opportunity to comment.

E2016-013 (DEIS - Coeur Rochester Mine Area 10 Amendment and Closure Plan – Pershing County)

#### AGENCY COMMENTS:

Plans and specifications for the replacement of public drinking water wells PW-2A and PW-3A by proposed new wells PW-2B and PW-3B will need to be submitted to the Nevada Division of Environmental Protection (NDEP), Bureau

of Safe Drinking Water (BSDW) for review and approval prior to construction. Questions or comments should be directed to Jim Balderson at 775-687-9517, or [jbalderson@ndep.nv.gov](mailto:jbalderson@ndep.nv.gov).

Signature: Jim Balderson P.E.

**Comment Letter 100**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

John Ruhs  
Bureau of Land Management  
1340 Financial Boulevard  
Reno, Nevada 89520

Subject: Draft Environmental Impact Statement (EIS) for the Coeur Rochester Mine Plan of Operations Amendment 10 and Closure Plan. Pershing County, Nevada [CEQ #20150230]

Dear Mr. Ruhs:

The U.S. Environmental Protection Agency (EPA) has reviewed the Coeur Rochester Mine Environmental Impact Statement (EIS). Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementation Regulations at 40 CFR 1500 - 1508, and our review authority under Section 309 of the Clean Air Act.

Under the proposed action, Coeur Rochester Incorporated (CRI) would expand the Coeur Rochester Mine located on BLM lands in Pershing County, Nevada, near the town of Lovelock. The proposed expansion would increase the authorized surface disturbance on the site by 231 acres to a total of 2,170. The project includes continued operation of the site's operating cyanide heap leach facilities, expansion of heap IV and the construction of the proposed Stage V heap. In addition the proposed project includes revisions to the Coeur Rochester Mine Closure Plan to cover the proposed expansion.

Numerous post-closure monitoring and mitigation activities will need to be conducted by Coeur Rochester, Incorporated (CRI) to ensure protection of water quality and wildlife in the project vicinity. The Draft EIS includes a brief description of some of the post-closure obligations associated with the mine's continued operation expansion and the proposed revisions to the closure plan; however, it does not include a discussion of the need for post-closure financial assurances to pay for these activities, nor does it acknowledge the existing trust, which covers the currently approved closure and post-closure activities. In addition no cost estimate for the long-term trust, nor any analysis of its adequacy or the uncertainties associated with the estimate are provided. Therefore, EPA finds that the Draft EIS does not adequately demonstrate that

the costs of post-closure monitoring and mitigation for the expanded Coeur Rochester Mine Project will be covered for as long as needed to avoid significant environmental impacts.

Important geochemical information is missing from the DEIS. According to data included in the project record but left out of the DEIS the residual heap leach solution that would drain down in the closure and post-closure period is anticipated to exceed Nevada Profile I water quality reference values for aluminum, antimony, arsenic, lead, copper, iron, mercury and silver (CRI, 2014). In addition, we note that although the spent ore samples tested did not generate acid during the test period, the consultant who performed this geochemical analysis recommended that this material be treated as potentially acid generating in the long term due to its acid base accounting characteristics (Knight Piesold Consulting 2013). It is, therefore, critical that the heap leach facilities achieve the zero-discharge goal intended by the closure design. EPA is unable to determine whether this goal is likely to be attained due to an incomplete description of the closure and post-closure management of the heap leach facilities in the Draft. For example, the Draft EIS does not include any information regarding the time required for the heap leach facilities to reach a steady-state drainage rate, nor does the document note when, or even whether, the heap leach facilities are anticipated to reach a rate of drain-down that can be managed in a fully passive manner. Similarly, while the Draft EIS indicates that the heap leach c-cells would require excavation and total system replacement after 30 years (or sooner if post-closure monitoring identifies a need), it does not disclose that the c-cells would require excavation and replacement on a recurring 30 year interval -- an indefinitely recurring additional expense (personal correspondence with BLM staff, September 2015).

Absent sufficient funds for site maintenance, the potential exists that heap leach seepage exceeding numerous Nevada Profile I water quality reference values, and potentially of an acidic nature, would eventually be released to the environment due to an overflow of the plugged evaporation cells. E-cell D sits immediately above Lower American Canyon Spring, while c-cells G and in-heap cell II sit above South American Canyon Spring. These perennial springs feed small non-jurisdictional wetland communities and provide wildlife habitat. Any overflow from these c-cells would have a very short distance to travel before likely coming into contact with vegetation and wildlife communities. In addition, as discussed extensively in the Coeur Rochester Inc. Water Quantity and Quality Impacts Analysis” (Schiumberger Water Services, 2015), the mine site is underlain extensively by a fragmented network of shallow alluvial groundwater. This shallow alluvial groundwater would offer a ready pathway for any heap leach seepage that may escape containment to be transported into a surface water system.

EPA has rated the Coeur Rochester Mine Plan of Operations Amendment 10 and Closure Plan Draft EIS as ‘3 — Inadequate Information” (see Enclosure 1: “Summary of Rating Definitions and Follow-Up Action”) because it does not disclose adequate detail on what activities would be required for the proposed expansion in the post-closure period nor how funds would be secured to ensure that they are available as long as they are needed to implement critical

post-closure obligations. The information that EPA believes is needed includes: (1) a detailed description of the post-closure obligations for the proposed project, (2) an estimate of the amount needed to cover the costs of these obligations, (3) a detailed description of the proposed long-term funding mechanism that would be established for the proposed project (or description of how the existing trust would be modified); and (4) the updated reclamation/closure bond amount needed for the project.

We recommend that BLM: determine the appropriate level of funding for the reclamation/closure bond and the proposed long-term funding mechanism for the proposed project; analyze the adequacy of the funding amount and mechanism, including associated uncertainties; and circulate this information in a Supplemental Draft EIS for public comment, in accordance with NEPA and CEQ's NEPA Implementation Regulations. We recommend the Supplemental Draft EIS evaluate the anticipated effectiveness and risks of the Coeur Rochester Mine closure and post-closure commitments, and demonstrate that sufficient funds would be available to implement the post-reclamation obligations for as long as they are needed. EPA respectfully requests the opportunity to review this information and provide BLM our feedback before you publish the Supplemental Draft EIS. EPA's detailed comments on the Draft EIS are enclosed (Enclosure 2).

BLM and EPA agree that adequate financial assurance at mines is important to safeguard the environment. EPA continues to believe that the adequacy of financial assurance is an important element to be addressed and disclosed in the NEPA process. Without this information, EPA believes that decision-makers will not have important information concerning the likelihood that sufficient resources will be available for closure and post-closure mitigation, and the public may not understand the potential environmental and fiscal consequences of a proposed project.

We appreciate the opportunity to review this Draft EIS and look forward to working with BLM to resolve the issues outlined in this letter. In the meantime, if you have any questions, please call me at (415) 947-4238 or have your staff contact Carter Jessop, our lead NEPA reviewer for this project, at (415) 972-3815.

Sincerely,

Regional Administrator

Jared Blumenfeld

Enclosures:

(1) Summary of Rating Definitions and Follow-Up Action

(2) EPA's detailed comments on the Coeur Rochester Mine Plan of Operations Amendment 10 Draft EIS

#### SUMMARY OF EPA RATING DEFINITIONS\*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of

the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

#### ENVIRONMENTAL IMPACT OF THE ACTION

“LO” (Lack of Objections,) The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### “EC” (Environmental Concerns,)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### “EO” (Environmental Objections,)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### “EU” (Environmentally Unsatisfactory,)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

#### ADEQUACY OF THE IMPACT STATEMENT

##### “Category 1” (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

##### “Category 2” (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

“Category 3” (Inadequate,)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment

USEPA Detailed Comments on the Coeur Rochester Mine Plan of Operations Amendment 10 and Closure Plan Draft Environmental Impact Statement-October 13, 2015

**Heap Leach Closure and Post-Closure Financial Assurance**

At closure, residual drain-down from existing and proposed heap leach pads would be managed by a network of evaporation cells. Due to topographical constraints, limited space is available for the construction of these evaporation cells. Accordingly, a solution delivery and distribution system would connect many of these cells to one another in order to efficiently distribute the drain-down solution over the surface of the evaporation zone. According to the DEIS, the proposed action would extend the mine’s life by an estimated five to seven years, after which a period of passive leaching would take place followed by approximately five years of active reclamation and site closure. The heap leach facilities, however, are anticipated to require post-closure management and maintenance. In addition to regular monitoring to ensure all fluid-management components are operating properly, the BLM estimates that solids would accumulate in the evaporation cells, and, approximately 30 years after mine closure, the evaporation cells would need to be excavated, and their system components replaced. In conversations with BLM staff, we understand that this activity is conservatively estimated to be required every 30 years thereafter with no known or estimated end date.

Absent this post-closure site maintenance, it is likely that heap leach drain-down fluids would overflow the plugged c-cells, releasing mine influenced water to the environment. According to the data provided in the project record but excluded from the DEIS, the heap leach drain-down is anticipated to exceed Nevada Profile I reference values for aluminum, antimony, arsenic, lead, copper, iron, mercury, and silver. EPA notes that the c-cells are proposed for construction immediately adjacent to perennial springs fed by shallow groundwater. South American Canyon Spring and Lower American Canyon Spring feed a combined 0.2 acres of non-jurisdictional wetland habitat. Should the proposed c-cell system fail to contain heap leach residual drain-down

solution, particularly at c-cells D, G, and in-heap cell II, then those solutions can be reasonably expected to daylight in one or more of these springs, impairing their water quality and posing a risk to any wildlife and livestock utilizing them. Thus, if heap leach facilities and evaporation ponds are not properly managed over the long-term, the project could result in significant and long-term degradation of surface water and/or groundwater quality, as well as wildlife exposure to acute or chronic toxicity.

In order to pay for the existing post-closure site maintenance and management obligations at the site, the BLM has required CRI to establish a long term trust fund. Under the proposed expansion, this trust would need to be expanded and revised, increasing post-closure expenses considerably; however, the DEIS discusses the mine's post-closure obligations in only a cursory fashion. The document does not disclose the mine's need for a long term trust fund to pay for post-closure maintenance, disclose that post-closure funds would be needed to perform c-cell maintenance for an unknown period of time following closure, nor describe probable impacts or contingencies if inadequate funds are available when needed. Without this information, EPA is unable to fully assess the potentially significant environmental impacts of the proposed project and whether the project might result in a long term financial liability to the federal government in the future. e.g., under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

**Recommendation:** Determine and disclose the level of funding that would be needed for closure of the Coeur Rochester Mine proposed expansion, and disclose the specific mechanism that would be established to ensure that sufficient funds would be available when needed for that purpose. Circulate this information in a Revised or Supplemental Draft EIS for public comment. Include in the Revised or Supplemental Draft EIS a more comprehensive discussion of the heap leach closure plan and post-closure management/maintenance obligations. We recommend the document clearly describe the duration for which post closure site maintenance, particularly heap leach evaporation cell excavation and component replacement, will be required. We recommend the heap leach drain down curve (derived from Nevada Department of Environmental Protection's Reap Leach Drain-down Estimator) be included and its relevance described.

#### **Additional Long-Term Monitoring Maintenance Activities and Costs**

The Draft EIS describes the proposed construction of 10 evaporation cells located at the toe of or on top of heap leach pads I through V. These cells would be managed by a relatively complicated solution delivery and distribution system in order to maximize total evaporation. The Draft EIS does not adequately describe the pumps incorporated into the design of some of the c-cells to move solution between the cells, nor the pumps used to move solution from the c-cell storage compartment up to the evaporation zone (p. 2-47). It is unclear how long these pumps would need to operate or how they would be maintained.

**Recommendation:** Describe, in the Revised or Supplemental Draft EIS, all maintenance and management activities that would be required in the post-

closure period, including the maintenance requirements and eventual fate of the c-cell pumps.

In the Revised or Supplemental Draft EIS, specify all of the post-closure monitoring, O&M, and replacement activities, and describe their performance standards. Include the cost estimates for these activities, which are needed to estimate the overall long-term financial assurance obligation.--

Mine-influenced seepage emanating from the Stage I heap leach facility, its process ponds and pipelines has impacted shallow alluvial groundwater in the project area since as early as 2001. The Draft EIS indicates that process solution and calcium hypochlorite from accidental releases entered the shallow sediments adjacent to and/or underlying the Stage I heap (p. 1-17). In 2013, the Nevada Department of Environmental Protection mandated the installation and operation of a pump-back well system on the project site to prevent the spread of the contaminated plume at the site. This pump-back well now operates at a rate of approximate five gallons per minute. Page 2-58 of the Draft EIS indicates that this pump-back well would continue groundwater remediation pumping and recovery during the mine closure period, however the Draft EIS does not indicate the fate of this activity in the post-closure period. Although the c-cell system is designed for management of the pump-back volume in addition to the heap leach drain-down solution, it is unclear whether this well would be required to operate in perpetuity and, if so, what the expense of this activity would be and how it would be funded.

**Recommendation:** Describe, in the Revised or Supplemental Draft EIS, the closure and post closure plans for the groundwater remediation pumpback well. Include the anticipated operational timeline for this system and how its continued operation would be funded for as long as it is required.

#### **Summary of Geochemical Characterization**

Many BLM Mining EISs include a detailed discussion of the geochemical testing procedures employed and the results thereof; however, the Coeur Rochester Draft EIS contains only a very cursory summary of the geochemical characterization of the project's waste rock and ore materials, and notes that much of the geochemical analysis was performed before existing current testing methods and regulatory guidance were developed. While included in separate reference materials as part of the Plan of Operations, a description of the chemistry of the residual heap leach drain-down solution was not included in the Draft EIS. Absent this information, it is impossible to assess the importance and adequacy of many other project components. EPA found that, in order to access geochemical information fundamental to understanding the project's potential to degrade surface and groundwater quality, it was necessary to access referenced materials and the appendices of those referenced materials.

EPA supports the practice of "incorporation by reference" in the NEPA process in order to control the length and technical detail contained in an EIS; however, sufficient summary information should be included in the DEIS to enable the reader to understand the design and impacts of the proposed project and its alternatives. Supporting documentation can then be included in an appendix or

incorporated by reference, as appropriate (See CEQ's "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations" [Question 25b] for guidance on determining whether inclusion as an appendix or incorporation by reference is warranted). In this case, however, BLM did not include sufficient summary of, or citation or access to, key relevant information needed for informed decision making.

**Recommendation:** Include in the Revised or Supplemental Draft EIS a thorough discussion of the geochemical characteristics of project waste rock and ore, including a discussion of anticipated heap leach drain down solution. We recommend this discussion include not only the acid generating/acid neutralizing potential of these materials, but also their metals leaching potential and the concentrations of the relevant constituents anticipated in waste rock seepage and heap leach drain down.

Consider making referenced materials, including the Plan of Operations and its appendices, available in an electronic format or via download from the BLM's website. For future projects, we strongly recommend that this be done at the DEIS stage of the NEPA process, and that any documents incorporated by reference be sufficiently summarized in the DEIS.

### **Climate Change**

On December 18, 2014, the Council on Environmental Quality released revised draft guidance for public comment that describes how Federal departments and agencies should consider the effects of greenhouse gas emissions and climate change in their National Environmental Policy Act reviews. This guidance explains that agencies should consider both the potential effects of a proposed action on climate change, as indicated by its estimated greenhouse gas emissions, and the implications of climate change for the environmental effects of a proposed action.

The DEIS briefly discusses climate change and includes a calculation of the project's approximate CO<sub>2</sub> emissions and a discussion of the social cost of carbon in relationship to this project. Additionally, the DEIS compares the approximate CO<sub>2</sub> emissions associated with the project with global emissions. We believe the comparison of project emissions to global emissions does not provide meaningful information for a project-specific analysis. The DEIS does not identify any mitigation measures that could reduce or minimize the project's greenhouse gas emissions, nor does it consider climate change's potential impact upon the project. The latter is particularly relevant, given the limited evaporation cell capacity, the high metals concentrations of heap leach drain down solution, and the potential that climate change may affect precipitation patterns in the project area.

**Recommendations:** Include in the Revised or Supplemental DEIS a robust discussion of the potential impacts of climate change on the project and its environmental outcomes.

Instead of comparing project level emissions to global, U.S., or statewide emissions, provide a frame of reference, such as an applicable Federal, state,

tribal or local goal for GHG emission reductions, and discuss whether the emissions levels are consistent with such goals.

Identify and disclose all relevant, reasonable mitigation measures that could reduce greenhouse gas emissions, even if they are outside the jurisdiction of the BLM'. We offer the following potential measures for the BLM's consideration:

- Incorporation of energy efficiency measures and appropriate alternative energy components into the project, such as on-site solar and/or geothermal power generation;
- Use of conveyors rather than haul trucks wherever feasible, e.g., for transporting ore to processing areas and the heap leach facility; and
- Establishment of ride sharing or shuttle opportunities for mine employees commuting to the site from both nearby and distant communities.

### **Comment Letter 101**

From: Peggy Barclay <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 7:39 PM

Subject: Expand operations at the Rochester Mine

To: wfoweb@blm.gov

Count me among the supporters of Coeur Rochester's expansion plan. Thank you for addressing and analyzing potential impacts on air quality from mine emissions. Although the proposed action and alternatives would increase the atmospheric emissions of pollutants, Chapter 4 in the EIS identifies that emissions will still remain below regulated thresholds.

Please do the right thing and make the expansion of mining at Coeur Rochester a reality. The region is counting on it.

Sincerely,  
Peggy Barclay  
msnjcford@yahoo.com  
Anaconda, MT 59711

### **Comment Letter 102**

From: Steve Smith <supporter@supportcoeurrochester.com>

Date: Mon, Sep 14, 2015 at 9:25 AM

Subject: Rochester Mine POA No. 10

To: wfoweb@blm.gov

Please add my name to the list of those who support Coeur Rochester's expansion plans.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

This expansion plan offers the environmental protection and economic stimulus that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Steve Smith  
ssmith@coeur.com  
Fernley, NV 89408

**Comment Letter 103**

From: KAY CEE P PAREDES <supporter@supportcoeurrochester.com>  
Date: Fri, Sep 11, 2015 at 11:17 AM  
Subject: Expand operations at the Rochester Mine  
To: wfoweb@blm.gov

Thank you for the opportunity to submit a comment regarding the Rochester Mine POA No. 10.

I disagree with Coeur Rochester's proposed action of moving the PAG material back into pit following mining. Alternative I would decrease the potential for environmental degradation and should be considered for the preferred alternative.

Please approve the plan and make the expansion of mining at Rochester a reality.

Sincerely,  
KAY CEE P PAREDES  
kaycee.paredes@ymail.com  
LOVELOCK, NV 89419

**Comment Letter 104**

From: Jared Fifield <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 4:07 PM  
Subject: Move forward with Coeur Rochester's expansion  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan and extend the life of the mine by five to seven years.

I appreciate that the POA 10 expansion was designed to avoid visual impacts to the Rochester Cultural District in Rochester Canyon. Even if visual impacts were to occur, it will complement the theme of the historic mining district.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations. Thank you.

Sincerely,  
Jared Fifield  
jaredfifield@yahoo.com  
Fernley, NV 89408

**Comment Letter 105**

From: eric armstead <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 3:59 PM  
Subject: Approve Plan of Operations Amendment 10  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan that was submitted to BLM in June of 2013. Coeur has Hazardous Materials and Waste Management Plans that are in effect and complete and, as per the Envirofacts Database search function on the EPA website, there is a pattern of compliance. So it seems like Coeur manages their wastes properly and I am in support of continued mining operations at Coeur Rochester.

This expansion plan offers the environmental protection, good jobs, economic stimulus and production of precious metal that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
eric armstead  
starsky41710@yahoo.com  
lovelock, NV 89419

**Comment Letter 106**

From: Andrew Edblom <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 3:56 PM  
Subject: Strong support for Coeur Rochester  
To: wfoweb@blm.gov

I appreciate the BLM offering this opportunity to comment on the Coeur Rochester plan to expand operations at the Rochester mine.

Coeur has Hazardous Materials and Waste Management Plans that are in effect and complete and, as per the Envirofacts Database search function on the EPA website, there is a pattern of compliance. So it seems like Coeur manages their wastes properly and I am in support of continued mining operations at Coeur Rochester.

Let's get moving as quickly as possible to make this expansion happen. It's the best thing for the environment, great for Pershing County and much needed for our economy and tax base.

Sincerely,  
Andrew Edblom  
aedblom@coeur.com  
Winnemucca, NV 89445

**Comment Letter 107**

From: Shawn Castro <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 3:27 PM

Subject: Proposed expansion of the Coeur Rochester Mine

To: wfoweb@blm.gov

I'm writing to submit my thoughts about Coeur Rochester's plan to expand mining operations in Pershing County.

Thank you for addressing and analyzing potential impacts on air quality from mine emissions. Although the proposed action and alternatives would increase the atmospheric emissions of pollutants, Chapter 4 in the EIS identifies that emissions will still remain below regulated thresholds.

Let's get moving as quickly as possible to make this expansion happen. It's the best thing for the environment, great for Pershing County and much needed for our economy and tax base.

Sincerely,  
Shawn Castro  
welderxyzz@gmail.com  
Fallpn, NV 89406

**Comment Letter 108**

From: Rodney sweet <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 3:27 PM

Subject: I support Coeur Rochester

To: wfoweb@blm.gov

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand operations and continue to employ Nevadans for another 5-7 years.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations.

Thank you.

Sincerely,  
Rodney sweet  
rsweet@coeur.com  
Winn, NV 89445

**Comment Letter 109**

From: Ellie Cevallos <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 3:24 PM  
Subject: Please approve Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

I am in strong support of Coeur Mining's proposal to expand operations at the Rochester Mine and ask that you approve this plan as soon as possible.

I support Alternative 1 because it makes sense to only handle the material once which will help limit surface area and exposure to oxygen creating an environment where ARD conditions could occur.

Put simply: I strongly support Coeur Rochester's proposal to expand mining and urge you to make a favorable decision on POA 10 as soon as possible.

Sincerely,  
Ellie Cevallos  
ellie.cevallos@elwoodstaffing.com  
Winnemucca, NV 89445

**Comment Letter 110**

From: Michelle Noble <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 3:43 PM  
Subject: Coeur Rochester's expansion  
To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

I urge you to approve and move forward with this expansion plan and approve POA 10 as quickly as possible.

Sincerely,  
Michelle Noble  
homsnv@gmail.com  
Winnemucca, NV 89446

**Comment Letter 111**

From: Max Lujan <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 3:12 PM  
Subject: Coeur Rochester's plan  
To: wfoweb@blm.gov

The best way to move forward at the Coeur Rochester Mine is for the BLM to approve Plan of Operations Amendment 10.

I appreciate that the POA 10 expansion was designed to avoid visual impacts to the Rochester Cultural District in Rochester Canyon. Even if visual impacts were to occur, it will complement the theme of the historic mining district.

Thank you for the opportunity to make my comments heard. Please make the Coeur Rochester expansion happen soon.

Sincerely,  
Max Lujan  
mlujan@coeur.com  
Winnemucca, NV 89445

**Comment Letter 112**

From: Jose J Gonzalez <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 3:09 PM  
Subject: Comments on Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Allow me to voice my strong support for Coeur Rochester's expansion plan.

As described in Chapter 4 of the EIS in the Air Quality Sections, emissions from the proposed project would increase US CO<sub>2</sub>e emissions and global emissions, however, at the national and global scales this would result in a negligible impact. CRI has instituted best available technologies in their facilities design to control and reduce emissions and impacts to air quality from constituents like mercury, carbon, and other analytes.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations. Thank you.

Sincerely,  
Jose J Gonzalez  
chuy.gonzalez@hotmail.com  
Lovelock, NV 89419

**Comment Letter 113**

From: Jesse Madrid <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 3:08 PM  
Subject: Approve Coeur Rochester's proposal  
To: wfoweb@blm.gov

Please include my comments as part of the public response to the proposed expansion of the Rochester Mine near Lovelock.

Thank you for addressing and analyzing potential impacts on air quality from mine emissions. Although the proposed action and alternatives would increase the atmospheric emissions of pollutants, Chapter 4 in the EIS identifies that emissions will still remain below regulated thresholds.

Please approve the plan and make the expansion of mining at Rochester a reality.

Sincerely,  
Jesse Madrid  
jmadrid@coeur.com  
Winnemucca, NV 89445

**Comment Letter 114**

From: carlos portillo <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 3:13 PM

Subject: Strong support for Coeur Rochester

To: wfoweb@blm.gov

Please include my comments as part of the public response to the proposed expansion of the Rochester Mine near Lovelock.

I appreciate that the POA 10 expansion was designed to avoid visual impacts to the Rochester Cultural District in Rochester Canyon. Even if visual impacts were to occur, it will complement the theme of the historic mining district.

Thank you for the opportunity to make my comments heard. Please make the Coeur Rochester expansion happen soon.

Sincerely,  
carlos portillo  
cportillo1963@gmail.com  
lovelock, NV 89419

**Comment Letter 115**

From: Desmond Ward <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 3:04 PM

Subject: Strong support for Coeur Rochester

To: wfoweb@blm.gov

The best way to move forward at the Coeur Rochester Mine is for the BLM to approve Plan of Operations Amendment 10.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

Thank you for the opportunity to make my comments heard. Please make the Coeur Rochester expansion happen soon.

Sincerely,  
Desmond Ward  
dward@coeur.com  
Sparks, NV 89434

**Comment Letter 116**

Date: Tue, Sep 15, 2015 at 3:15 PM

Subject: Proposed expansion of the Coeur Rochester Mine

To: wfoweb@blm.gov

Count me among the supporters of Coeur Rochester's expansion plan.

Alternative I should be the preferred alternative in the EIS because there are multiple PAG material storage areas in the pit currently. Consolidating them all into one makes sense and would help eliminate negative effects to the environment and make it easier to manage a consolidated unit.

Please do the right thing and make the expansion of mining at Coeur Rochester a reality. The region is counting on it.

Sincerely,

Lisa Armstead

momcop4ever@yahoo.com

lovelock, NV 89419

**Comment Letter 117**

From: Andrew Francis Huotte <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 3:04 PM

Subject: Please approve Coeur Rochester's expansion plan

To: wfoweb@blm.gov

Coeur Rochester's operation results in positive economic and environment conditions that strengthen our surrounding areas and communities. Please approve Amendment 10.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

Coeur Rochester's plan will protect much-needed jobs, stimulate the local and regional economy, increase tax revenues and protect the environment. Please approve this expansion plan as soon as possible.

Sincerely,

Andrew Francis Huotte

ahuotte@coeur.com

winnemucca, NV 89445

**Comment Letter 118**

From: Eric Olsen <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 2:22 PM

Subject: Approve Coeur Rochester's proposal

To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

From reviewing the EIS, I understand there will be no effects to air quality beyond the proposed mine plan boundary, which would 1) not impact surrounding wildlife habitat and 2) limit dust to the existing disturbed areas. Further, with the existing dust control measures in place, the emissions would be localized and won't affect the scenic value of the area.

The environmental impact will be insignificant and the economic impact will be substantial. Please approve Coeur Rochester's expansion plan as soon as possible.

Sincerely,  
Eric Olsen  
eolsen@coeur.com  
Winnemucca, NV 89445

**Comment Letter 119**

From: Felicia Fifield <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 4:30 PM  
Subject: Comments on Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

Count me among the supporters of Coeur Rochester's expansion plan.

Less than 2% of the material encountered during mining of the Rochester Pit may be potentially acid generating. I support Coeur moving the in pit PAG material storage to the top of waste rock pile and think that the method of encapsulation proposed is conservative. This approach will help protect surface water and groundwater in the region. Therefore, I propose that Alternative 1 is selected as the preferred alternative in the EIS.

I urge you to approve and move forward with Coeur Rochester's expansion plan and approve it as quickly as possible.

Sincerely,  
Felicia Fifield  
felicia\_rose03@yahoo.com  
Fernley, NV 89408

**Comment Letter 120**

From: Hayley Noble <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 4:35 PM  
Subject: Proposed expansion of the Coeur Rochester Mine  
To: wfoweb@blm.gov

Please add my name to the list of those who support Coeur Rochester's expansion plans.

As described in Chapter 4 of the EIS in the Air Quality Sections, emissions from the proposed project would increase US CO<sub>2</sub>e emissions and global emissions, however, at the national and global scales this would result in a negligible impact. CRI has instituted best available technologies in their facilities design to control and reduce emissions and impacts to air quality from constituents like mercury, carbon, and other analytes.

Please do the right thing and make the expansion of mining at Coeur Rochester a reality. The region is counting on it.

Sincerely,  
Hayley Noble  
hayleynoble09@gmail.com  
Winnemucca , NV 89445

**Comment Letter 121**

From: Tina Thomas <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 4:43 PM  
Subject: Rochester Mine POA No. 10  
To: wfoweb@blm.gov

Thank you for the opportunity to submit a comment regarding the Rochester Mine POA No. 10.

I disagree with Coeur Rochester's proposed action of moving the PAG material back into pit following mining. Alternative I would decrease the potential for environmental degradation and should be considered for the preferred alternative.

Please move forward in approving this expansion plan in a timely manner. It's the right thing to do.

Sincerely,  
Tina Thomas  
tinathomas59@gmail.com  
Winnemucca, NV 89445

**Comment Letter 122**

From: Mike Springfield <supporter@supportcoeurrochester.com>  
Date: Mon, Sep 14, 2015 at 9:29 AM  
Subject: Coeur Rochester Mine POA10 DEIS Comments  
To: wfoweb@blm.gov

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand operations and continue to employ Nevadans for another 5-7 years.

As described in Chapter 4 of the EIS in the Air Quality Sections, emissions from the proposed project would increase US CO<sub>2</sub>e emissions and global emissions, however, at the national and global scales this would result in a negligible

impact. CRI has instituted best available technologies in their facilities design to control and reduce emissions and impacts to air quality from constituents like mercury, carbon, and other analytes.

Coeur Rochester's plan will protect much-needed jobs, stimulate the local and regional economy, increase tax revenues and protect the environment. Please approve this expansion plan as soon as possible.

Sincerely,  
Mike Springfield  
mspringfield@coeur.com  
Fallon, NV 89406

**Comment Letter 123**

From: Casey Nault <supporter@supportcoeurrochester.com>  
Date: Mon, Sep 14, 2015 at 12:52 PM  
Subject: I support Coeur Rochester  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan and extend the life of the mine by five to seven years.

Thank you for addressing and analyzing potential impacts on air quality from mine emissions. Although the proposed action and alternatives would increase the atmospheric emissions of pollutants, Chapter 4 in the EIS identifies that emissions will still remain below regulated thresholds.

The positive impact that the expansion of this mine will have on Pershing County and all of Nevada is very significant and I urge you to approve and move forward with this plan quickly.

Thank you.  
Sincerely,  
Casey Nault  
cnault@coeur.com  
Chicago, IL 60603

**Comment Letter 124**

From: Juan Ramon Gonzalez <supporter@supportcoeurrochester.com>  
Date: Mon, Sep 14, 2015 at 1:55 PM  
Subject: Expand operations at the Rochester Mine  
To: wfoweb@blm.gov

Please add my name to the list of those who support Coeur Rochester's expansion plans.

Coeur has a proven program in place for managing waste on the mine site. The program has been designed, permitted, and constructed in accordance with local, state, and federal regulations. In Chapter 2 of the EIS, Coeur has indicated

their commitment that no hazardous or toxic materials would be disposed of on public lands. I support these business practices and extending the mine life.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations.

This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
Juan Ramon Gonzalez  
jramonromeo14@gmail.com  
lovelock, NV 89419

**Comment Letter 125**

From: Vanessa Smith <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 4:49 PM  
Subject: Proposed expansion of the Coeur Rochester Mine  
To: wfoweb@blm.gov

Please include my comments as part of the public response to the proposed expansion of the Rochester Mine near Lovelock.

Thank you for addressing and analyzing potential impacts on air quality from mine emissions. Although the proposed action and alternatives would increase the atmospheric emissions of pollutants, Chapter 4 in the EIS identifies that emissions will still remain below regulated thresholds.

I urge you to approve and move forward with Coeur Rochester's expansion plan and approve it as quickly as possible.

Sincerely,  
Vanessa Smith  
Vsmith0209@gmail.com  
Fernley , NV 89408

**Comment Letter 126**

From: Dave Keane <supporter@supportcoeurrochester.com>  
Date: Mon, Sep 14, 2015 at 2:01 PM  
Subject: Proposed expansion of the Coeur Rochester Mine  
To: wfoweb@blm.gov

Please approve Coeur Rochester's expansion plan that was submitted to BLM in June of 2013.

Coeur seems committed to environmental protection and stewardship and reports on its website that overall greenhouse gas emissions have reduced 24% since 2012. The EIS demonstrates that the proposed actions will have a negligible effect on climate change because Chapter 5 states that cumulative modeling results indicate that the ambient concentrations for all modeled criteria pollutants will be below the applicable NAAQS.

Please approve the plan and make the expansion of mining at Rochester a reality.

Sincerely,  
Dave Keane  
Kean\_@yahoo.com  
Lovelock, NV 89419

**Comment Letter 127**

From: jerry splude <supporter@supportcoeurrochester.com>  
Date: Mon, Sep 14, 2015 at 3:44 PM  
Subject: Rochester Mine POA No. 10  
To: wfoweb@blm.gov

I'm writing to submit my thoughts about Coeur Rochester's plan to expand mining operations in Pershing County.

Coeur seems committed to environmental protection and stewardship and reports on its website that overall greenhouse gas emissions have reduced 24% since 2012. The EIS demonstrates that the proposed actions will have a negligible effect on climate change because Chapter 5 states that cumulative modeling results indicate that the ambient concentrations for all modeled criteria pollutants will be below the applicable NAAQS.

I urge you to make a decision that allows Coeur Rochester to expand its mining operations. Thank you.

Sincerely,  
jerry splude  
jsplude@coeur.com  
fernley, NV 89408

**Comment Letter 128**

From: KelbyKestle <supporter@supportcoeurrochester.com>  
Date: Mon, Sep 14, 2015 at 8:38 PM  
Subject: I support Coeur Rochester  
To: wfoweb@blm.gov

Allow me to voice my strong support for Coeur Rochester's expansion plan.

Although it appears that acid generation is unlikely given the geology and low acidity of the rock types found onsite, Coeur Rochester has gone above and beyond to ensure that sufficient measures are in place to monitor for unlikely ARD formation. As stated in Section 2.2.10 of the EIS, Coeur has also implemented new contingency measures should development of ARD be identified, which further demonstrates Coeur's commitment to environmental protections.

Put simply: I strongly support Coeur Rochester's proposal to expand mining and urge you to make a favorable decision on POA 10 as soon as possible.

Sincerely,  
Kelby Kestle  
kkestle@coeur.com  
Fernley, NV 89408

**Comment Letter 129**

From: Smokey Weagant <supporter@supportcoeurrochester.com>  
Date: Mon, Sep 14, 2015 at 8:46 PM  
Subject: Coeur Rochester's plan  
To: wfoweb@blm.gov

The best way to move forward at the Coeur Rochester Mine is for the BLM to approve Plan of Operations Amendment 10.

It is unreasonable to consider moving the PAG material back into the pit as suggested in the proposed action. Alternative 1 is a reasonable alternative because it reduces the potential for problems to occur and seems to have been well studied.

Coeur Rochester's plan will protect much-needed jobs, stimulate the local and regional economy, increase tax revenues and protect the environment. Please approve this expansion plan as soon as possible.

Sincerely,  
Smokey Weagant  
kweagant@coeur.com  
Lovelock, NV 89419

**Comment Letter 130**

From: Chris Beard <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 3:06 PM  
Subject: Strong support for Coeur Rochester  
To: wfoweb@blm.gov

Allow me to voice my strong support for Coeur Rochester's expansion plan.

From reviewing the EIS, I understand there will be no effects to air quality beyond the proposed mine plan boundary, which would 1) not impact surrounding wildlife habitat and 2) limit dust to the existing disturbed areas. Further, with the existing dust control measures in place, the emissions would be localized and won't affect the scenic value of the area.

This expansion plan offers the environmental protection and economic stimulus that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Chris Beard  
cbeard@coeur.com  
Winnemucca, NV 89445

**Comment Letter 131**

From: Cynthia Portman <supporter@supportcoeurrochester.com>  
Date: Mon, Sep 14, 2015 at 5:17 PM  
Subject: Coeur POA 10 Project (Rehberg)  
To: wfoweb@blm.gov

Allow me to voice my strong support for Coeur Rochester's expansion plan.

I support Alternative 1 because it makes sense to only handle the material once which will help limit surface area and exposure to oxygen creating an environment where ARD conditions could occur.

The environmental impact will be insignificant and the economic impact will be substantial. Please approve Coeur Rochester's expansion plan as soon as possible.

Sincerely,  
Cynthia Portman  
creeksidenv@sbcglobal.net  
Lovelock, NV 89419

**Comment Letter 132**

From: Gene Malay <supporter@supportcoeurrochester.com>  
Date: Mon, Sep 14, 2015 at 4:26 PM  
Subject: Comments on Coeur Rochester's expansion plan  
To: wfoweb@blm.gov

The best way to move forward at the Coeur Rochester Mine is for the BLM to approve Plan of Operations Amendment 10.

Less than 2% of the material encountered during mining of the Rochester Pit may be potentially acid generating. I support Coeur moving the in pit PAG material storage to the top of waste rock pile and think that the method of encapsulation proposed is conservative. This approach will help protect surface water and groundwater in the region. Therefore, I propose that Alternative 1 is selected as the preferred alternative in the EIS.

The environmental impact will be insignificant and the economic impact will be substantial. Please approve Coeur Rochester's expansion plan as soon as possible.

Sincerely,  
Gene Malay  
malay.lineman@gmail.com  
Lovelock, NV 89419

**Comment Letter 133**

From: Brian Ford <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 3:07 PM  
Subject: Coeur Rochester's expansion  
To: wfoweb@blm.gov

Thank you for the opportunity to submit a comment regarding the Rochester Mine POA No. 10.

I am interested in the historical information that would be derived from mitigating the Panama Site and how it would be a great addition to the Marzen House Museum collection. There is already a great collection on Rochester at the museum and adding new historical material is a good idea.

I urge you to approve and move forward with this expansion plan and approve POA 10 as quickly as possible.

Sincerely,  
Brian Ford  
bford@coeur.com  
Golconda, NV 89414

**Comment Letter 134**

From: anthony booth <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 5:18 AM  
Subject: I support Coeur Rochester  
To: wfoweb@blm.gov

I am in strong support of Coeur Mining's proposal to expand operations at the Rochester Mine and ask that you approve this plan as soon as possible

Thank you for addressing and analyzing potential impacts on air quality from mine emissions. Although the proposed action and alternatives would increase the atmospheric emissions of pollutants, Chapter 4 in the EIS identifies that emissions will still remain below regulated thresholds.

Thank you for the opportunity to make my comments heard. Please make the Coeur Rochester expansion happen soon.

Sincerely,  
anthony booth  
po box 801  
lovelock, NV 89419

**Comment Letter 135**

From: Silvia Rosas <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 8:10 PM  
Subject: Strong support for Coeur Rochester  
To: wfoweb@blm.gov

Let's move forward with the expansion of Coeur Rochester's mining operations near Lovelock.

Although it appears that acid generation is unlikely given the geology and low acidity of the rock types found onsite, Coeur Rochester has gone above and beyond to ensure that sufficient measures are in place to monitor for unlikely ARD formation. As stated in Section 2.2.10 of the EIS, Coeur has also implemented new contingency measures should development of ARD be identified, which further demonstrates Coeur's commitment to environmental protections.

Thank you for the chance to submit my comments on Coeur Rochester's proposal to expand mining operations. This is a critical issue for our community and state and I urge you to proceed as quickly as possible.

Sincerely,  
Silvia Rosas  
srosas9396@gmail.com  
Lovelock, NV 89419

**Comment Letter 136**

From: Felipe I. Guerrero Jr. <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 5:41 AM

Subject: Strong support for Coeur Rochester

To: wfoweb@blm.gov

Allow me to voice my strong support for Coeur Rochester's expansion plan.

Less than 2% of the material encountered during mining of the Rochester Pit may be potentially acid generating. I support Coeur moving the in pit PAG material storage to the top of waste rock pile and think that the method of encapsulation proposed is conservative. This approach will help protect surface water and groundwater in the region. Therefore, I propose that Alternative 1 is selected as the preferred alternative in the EIS.

The positive impact that the expansion of this mine will have on Pershing County and all of Nevada is very significant and I urge you to approve and move forward with this plan quickly. Thank you.

Sincerely,  
Felipe I. Guerrero Jr.  
fgjr752@gmail.com  
Fernley, NV 89408

**Comment Letter 137**

From: Darrin Sander <supporter@supportcoeurrochester.com>

Date: Wed, Sep 16, 2015 at 5:42 AM

Subject: Move forward with Coeur Rochester's expansion

To: wfoweb@blm.gov

Rochester mine supports my family, helps make the surrounding communities a better place, and provides good safe jobs for over 300 people.

Sincerely,  
Darrin Sander  
dsanders@coeur.com  
Fernly, NV 89408

**Comment Letter 138**

From: Connie Campbell <supporter@supportcoeurrochester.com>  
Date: Tue, Sep 15, 2015 at 7:05 PM  
Subject: Expand operations at the Rochester Mine  
To: wfoweb@blm.gov  
Please approve Coeur Rochester's expansion plan that was submitted to BLM in June of 2013.

I appreciate that the POA 10 expansion was designed to avoid visual impacts to the Rochester Cultural District in Rochester Canyon. Even if visual impacts were to occur, it will complement the theme of the historic mining district.

This expansion plan offers the environmental protection, good jobs, economic stimulus and production of precious metal that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Connie Campbell  
campbellsoup62004@yahoo.com  
lovelock, NV 89419

**Comment Letter 139**

From: Felipe I. Guerrero Jr. <supporter@supportcoeurrochester.com>  
Date: Wed, Sep 16, 2015 at 5:43 AM  
Subject: Expand operations at the Rochester Mine  
To: wfoweb@blm.gov

I am in strong support of Coeur Mining's proposal to expand operations at the Rochester Mine and ask that you approve this plan as soon as possible.

Coeur seems committed to environmental protection and stewardship and reports on its website that overall greenhouse gas emissions have reduced 24% since 2012. The EIS demonstrates that the proposed actions will have a negligible effect on climate change because Chapter 5 states that cumulative modeling results indicate that the ambient concentrations for all modeled criteria pollutants will be below the applicable NAAQS.

This expansion plan offers the environmental protection, good jobs, economic stimulus and production of precious metal that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Felipe I. Guerrero Jr.  
fgjr752@gmail.com  
Fernley, NV 89408

**Comment Letter 140**

From: Shirley Short <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 7:55 PM

Subject: I support Coeur Rochester

To: wfoweb@blm.gov

Thank you for allowing me to comment on the proposed expansion of the Coeur Rochester Mine.

Less than 2% of the material encountered during mining of the Rochester Pit may be potentially acid generating. I support Coeur moving the in pit PAG material storage to the top of waste rock pile and think that the method of encapsulation proposed is conservative. This approach will help protect surface water and groundwater in the region. Therefore, I propose that Alternative 1 is selected as the preferred alternative in the EIS.

This expansion plan offers the environmental protection and economic stimulus that we need. Please approve POA 10 as quickly as possible.

Sincerely,  
Shirley Short  
shirleyshort@yahoo.com  
Lovelock, NV 89419

**Comment Letter 141**

From: Sasha Darr <supporter@supportcoeurrochester.com>

Date: Tue, Sep 15, 2015 at 8:45 PM

Subject: I support Coeur Rochester

To: wfoweb@blm.gov

Please add my name to the list of those who support Coeur Rochester's expansion plans.

I support Alternative 1 because it makes sense to only handle the material once which will help limit surface area and exposure to oxygen creating an environment where ARD conditions could occur.

Please do the right thing and make the expansion of mining at Coeur Rochester a reality. The region is counting on it.

Sincerely,  
Sasha Darr  
4100 Frontage RD  
Imlay, NV 89418

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